# **SWN PRODUCTION COMPANY, LLC**

# **BONNETTE MSH PAD**

**GENERAL PERMIT G70-D APPLICATION** 

SUBMITTED TO WVDEP DIVISION OF AIR QUALITY FEBRUARY 2017

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#### **INTRODUCTION**

SWN Production Company, LLC (SWN), submits this G70-D General Permit Application for the Bonnette MSH Pad. The facility currently operated under Permit No. G70-A182, issued on October 22, 2015. With this application, SWN requests authorization to operate under the General Permit G70-D for Oil and Natural Gas Production Facilities. Included with this application are changes in the emission estimates for the emission sources at the facility. The changes are summarized below:

- Six (6) existing wells have been added to the equipment representation.
- One (1) 400-bbl condensate tank has been added to the equipment representation.
- One (1) 400-bbl produced water tank has been added to the equipment representation.
- Fugitive component counts have been revised based on the equipment changes.

No changes were made to the emission estimates for the existing equipment. Note that other small storage tanks may be present on site (i.e., methanol, lube oil) but are considered de minimis sources per Table 45-13B and are listed on the application form.

#### **Proposed Emissions**

Emissions calculations for the project are presented in Attachment T. A fuel heating value of 905 Btu/scf was used to calculate emissions from natural gas-fired equipment. Actual heating value may vary (generally 905 - 1,300) but using a lower heating value in the emissions calculations provides a more conservative (higher) estimate of fuel use.

Emissions from the Caterpillar engines and Bucks VRU engine were calculated with manufacturer data when available and AP-42/EPA emissions factors for the remaining pollutants.

Condensate tank emissions were calculated by creating a profile in the EPA TANKS 4.0.9d model using properties obtained in a representative liquids analysis as the tank contents. Although produced water storage tanks contain primarily water, a profile was created in EPA TANKS 4.0.9d assuming 1% of the total throughput as condensate and 99% as water to provide a conservative emissions estimate of the trace hydrocarbons that may be entrained in the water. Flashing emissions were calculated using ProMax process simulation software. Condensate loading has been calculated using the properties from EPA TANKS 4.0.9d and process simulation.

Fugitive emissions were calculated with a component count by equipment type from a similar facility, and representative extended gas and liquids analyses. Fugitive haul road emissions were calculated using EPA/AP-42 methodologies.

Greenhouse gas emissions were calculated with the latest EPA factors and manufacturer data when available. Documents used as references for the emissions calculations including manufacturer specification sheets, gas and liquids analyses, and process simulation results are attached.

#### **REGULATORY DISCUSSION**

#### **STATE**

45 CSR 13 - PERMITS FOR CONSTRUCTION, MODIFICATION, RELOCATION AND OPERATION OF STATIONARY SOURCES OF AIR POLLUTANTS, NOTIFICATION REQUIREMENTS, ADMINISTRATIVE UPDATES, TEMPORARY PERMITS, GENERAL PERMITS, AND PROCEDURES FOR EVALUATION:

The facility requests to operate under the General Permit G70-D. Emissions of carbon monoxide and volatile organic compounds are less than 80 tons per year (TPY). Oxides of nitrogen emissions are less than 50 TPY and particulate matter 10/2.5 and sulfur dioxide emissions are each less than 20 TPY. Also, the facility will have less than 8 TPY for each hazardous air pollutant and less than 20 tons for total hazardous air pollutants.

#### **45 CSR 22 - AIR QUALITY MANAGEMENT FEE PROGRAM:**

The facility will be required to maintain a valid Certificate to Operate on the premises.

### **45 CSR 30 - REQUIREMENTS FOR OPERATING PERMITS:**

Emissions from the facility do not exceed major source thresholds; therefore, this rule does not apply.

#### **FEDERAL**

40 CFR PART 60 SUBPART KB—STANDARDS OF PERFORMANCE FOR VOLATILE ORGANIC LIQUID STORAGE VESSELS (INCLUDING PETROLEUM LIQUID STORAGE VESSELS) FOR WHICH CONSTRUCTION, RECONSTRUCTION, OR MODIFICATION COMMENCED AFTER JULY 23, 1984

The affected facility to which this Subpart applies is each storage vessel with a capacity greater than or equal to 75 cubic meters (m3) that is used to store volatile organic liquids (VOL) for

which construction, reconstruction, or modification is commenced after July 23, 1984. The tanks at this facility were constructed after the effective date of this Subpart but are less than 75 m3 (which equals approximately 471 bbl); therefore, this Subpart does not apply.

# 40 CFR PART 60 SUBPART KKK - STANDARDS OF PERFORMANCE FOR STATIONARY FOR EQUIPMENT LEAKS OF VOC FROM ONSHORE NATURAL GAS PROCESSING PLANTS:

The facility is not considered an affected source (natural gas processing plant) and is therefore not subject to this Subpart.

# 40 CFR PART 60 SUBPART IIII - STANDARDS OF PERFORMANCE FOR STATIONARY COMPRESSION IGNITION INTERNAL COMBUSTION ENGINES:

The facility does not contain the affected source (diesel-fired engine) and is therefore not subject to this Subpart.

# 40 CFR PART 60 SUBPART JJJJ - STANDARDS OF PERFORMANCE FOR STATIONARY SPARK IGNITION INTERNAL COMBUSTION ENGINES:

The proposed 145-hp, four-stroke, rich-burn natural gas-fired flash gas compressor engines are assumed to have been constructed after the June 12, 2006 effective date and manufactured after July 1, 2008; therefore, they will be subject to this subpart. ENG-1 has a horsepower rating of 145-hp (between 100-hp and 499-hp) and was manufactured on February 13, 2015 (after January 1, 2011); therefore, it is subject to the Stage II emission limits of this subpart. The manufacture dates of the remaining Caterpillar G3306 NA engine and the VRU engine are not yet known but are presumed to be subject to NSPS Subpart JJJJ as new engines.

# 40 CFR PART 60 SUBPART OOOO - STANDARDS OF PERFORMANCE FOR CRUDE OIL AND NATURAL GAS PRODUCTION, TRANSMISSION, AND DISTRIBUTION:

The emission sources affected by this Subpart include well completions, pneumatic controllers, equipment leaks from natural gas processing plants, sweetening units at natural gas processing plants, reciprocating compressors, centrifugal compressors and storage vessels which are constructed, modified or reconstructed after August 23, 2011 and before September 18, 2015.

Two of the existing gas wells located at this production pad were drilled during the effective date of this rule; therefore, they are affected sources subject to the applicable provisions of this Subpart.

Pneumatic controllers affected by this Subpart include continuous bleed, natural gas-driven pneumatic controllers with a natural gas bleed rate greater than 6 SCFH. No pneumatic devices with a continuous bleed greater than 6 SCFH will be installed at this facility.

Storage vessels affected by this Subpart include those with VOC emissions greater than 6 TPY. The storage vessels have VOC emissions below 6 TPY per tank and are not subject to the requirements of this Subpart.

# 40 CFR PART 60 SUBPART OOOOA - STANDARDS OF PERFORMANCE FOR CRUDE OIL AND NATURAL GAS FACILITIES FOR WHICH CONSTRUCTION, MODIFICATION, OR RECONSTRUCTION COMMENCED AFTER SEPTEMBER 18, 2015:

The emission sources affected by this Subpart include well completions, centrifugal compressors, reciprocating compressors, pneumatic controllers, storage vessels, fugitive sources at well sites, fugitive sources at compressor stations, pneumatic pumps, equipment leaks from natural gas processing plants and sweetening units at natural gas processing plants which are constructed, modified or reconstructed after September 18, 2015.

Six of the existing gas wells located at this production pad were drilled during the effective date of this rule; therefore, they are affected sources subject to the applicable provisions of this Subpart. The storage vessels have VOC emissions below 6 TPY per tank and are not subject to the requirements of this Subpart.

# 40 CFR PART 63 SUBPART HH - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES FROM OIL AND NATURAL GAS PRODUCTION FACILITIES:

The site is a minor (area) source of hazardous air pollutants. This Subpart applies to affected emission points that are located at facilities that are major and area sources of HAP, and either process, upgrade, or store hydrocarbon liquids prior to custody transfer or that process, upgrade, or store natural gas prior to entering the natural gas transmission and storage source category. For purposes of this Subpart natural gas enters the natural gas transmission and storage source category after the natural gas processing plant, if present. The facility is a minor (area) source of HAP; however, there is no triethylene glycol (TEG) dehydration unit present at the facility and therefore this Subpart does not apply.

40 CFR PART 63 SUBPART HHH - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES FROM NATURAL TRANSMISSION AND STORAGE FACILITIES:

The facility is not a natural gas transmission and storage facility and is therefore not subject to this Subpart.

# 40 CFR PART 63 SUBPART ZZZZ - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES FROM STATIONARY RECIPROCATING INTERNAL COMBUSTION ENGINES - AREA SOURCE:

The original rule, published on February 26, 2004, initially affected new (constructed or reconstructed after December 19, 2002) reciprocating internal combustion engines (RICE) with a site-rating greater than 500 brake horsepower (HP) located at a major source of HAP emissions. On January 18, 2008, EPA published an amendment that promulgated standards for RICE constructed or reconstructed after June 12, 2006 with a site rating less than or equal to 500 HP located at major sources, and for engines constructed and reconstructed after June 12, 2006 located at area sources. On August 10, 2010, EPA published another amendment that promulgated standards for existing (constructed or reconstructed before June 12, 2006) RICE at area sources and existing RICE (constructed or reconstructed before June 12, 2006) with a site rating of less than or equal to 500 HP at major sources.

Owners and operators of new or reconstructed engines at area sources must meet the requirements of Subpart ZZZZ by complying with either 40 CFR Part 60 Subpart IIII (for CI engines) or 40 CFR Part 60 Subpart JJJJ (for SI engines). Based on emission calculations, this facility is a minor source of HAP. The engines are subject to NSPS Subpart JJJJ and comply with MACT Subpart ZZZZ by complying with the requirements of NSPS Subpart JJJJ.

## **APPLICATION FOR GENERAL PERMIT REGISTRATION**



#### west virginia department of environmental protection

Division of Air Quality 601 57th Street SE Charleston, WV 25 4 Phone (304) 926-0475 Fax (304) 926-0479 www.dep.wv.gov

# G70-D GENERAL PERMIT REGISTRATION APPLICATION

PREVENTION AND CONTROL OF AIR POLLUTION IN REGARD TO THE CONSTRUCTION, MODIFICATION, RELOCATION, ADMINISTRATIVE UPDATE AND OPERATION OF NATURAL GAS PRODUCTION FACILITIES LOCATED AT THE WELL SITE

NATURAL GASTROI	JUCITON FACIL	HILES LOCATED AT IN	E WELL SILE	
□CONSTRUCTION □MODIFICATION □RELOCATION	□MODIFICATION			
SE	CTION 1. GENE	RAL INFORMATION		
Name of Applicant (as registered with the V	WV Secretary of S	tate's Office): SWN Prod	uction Company, LLC	
Federal Employer ID No. (FEIN): 26-4388	3727			
Applicant's Mailing Address: 10000 E	nergy Drive			
City: Spring	State: TX		ZIP Code: 77389	
Facility Name: Bonnette MSH Pad				
Operating Site Physical Address: 5401 Sai If none available, list road, city or town and				
City: Proctor	Zip Code: 2605	5	County: Marshall	
Latitude & Longitude Coordinates (NAD83, Latitude: 39.72041 Longitude: -80.71138	, Decimal Degrees	s to 5 digits):	'	
SIC Code: 1311		DAQ Facility ID No. (For existing facilities) 051 - 00155		
NAICS Code: 211111				
C	ERTIFICATION	OF INFORMATION		
This G70-D General Permit Registration Official is a President, Vice President, Sec Directors, or Owner, depending on business authority to bind the Corporation, Pa Proprietorship. Required records of dail compliance certifications and all requir Representative. If a business wishes to certioff and the appropriate names and sign: unsigned G70-D Registration Application utilized, the application will b	retary, Treasurer, structure. A busintnership, Limited by throughput, housed notifications of an Authorized atures entered. An will be returned	General Partner, General M ness may certify an Authori Liability Company, Associ ars of operation and mainten nust be signed by a Respons Representative, the official by administratively incomp to the applicant. Further	anager, a member of the Board of zed Representative who shall have ation, Joint Venture or Sole ance, general correspondence, ible Official or an Authorized agreement below shall be checked lete or improperly signed or more, if the G70-D forms are not	
I hereby certify that <u>Carla Suszkowski</u> is a the business (e.g., Corporation, Partnership, and may obligate and legally bind the busin Official shall notify the Director of the Divid I hereby certify that all information contained documents appended hereto is, to the best of have been made to provide the most compre	Limited Liability ess. If the busines sion of Air Qualit ed in this G70-D ( f my knowledge, t	Company, Association Joir s changes its Authorized Re ty immediately.  General Permit Registration rue accurate and complete,	nt Venture or Sole Proprietorship) presentative, a Responsible  Application and any supporting	
Responsible Official Signature:	Phone: 832 Date:	796-1000) -796-1000)	Fax: 405-849-3102	
If applicable: Authorized Representative Signature: Name and Title: Email:	Phone: Date:	Fax:		
If applicable: Environmental Contact Name and Title: Clay Murral Email: Clay Murral@SWN.com	Pho	one: 304-884-1715 Date:	Fax:	

#### OPERATING SITE INFORMATION

Briefly describe the proposed new operation and/or any change(s) to the facility: This application proposes to add one 400-bbl condensate tank and one 400-bbl produced water tank. Fugitive emissions have also been updated based on the equipment changes.

Directions to the facility: From the intersection of CR 2 and CR 7 in New Martinsville, WV, travel east on CR 7 13.36 miles to CR 1/15 (Brock Ridge Road) and turn left onto CR 1/15. Travel 4.02 miles north on CR 1/15 to CR 89 and turn left onto CR 89. Travel 4.70 miles on CR 89 to the intersection of CR 89 and CR 4(Saint Joseph Baker Hill Road) and turn right onto CR 4. There is a church and cemetery at this intersection. The church parking lot will be on your left as you turn onto CR 4. Proceed 4.23 miles on CR 4 to the well pad entrance on the left.

#### ATTACHMENTS AND SUPPORTING DOCUMENTS

ATTACHMENTS AND SUPPORTING DOCUMENTS				
I have enclosed the following required documents:				
Check payable to WVDEP - Division of Air Quality with the appropriate application fee (per 45CSR13 and 45CSR22).				
<ul> <li>☑ Check attached to front of application.</li> <li>☐ I wish to pay by electronic transfer. Contact for payment (incl. name and email address):</li> <li>☐ I wish to pay by credit card. Contact for payment (incl. name and email address):</li> </ul>				
□\$500 (Construction, Modification, and Relocation)				
<sup>1</sup> Only one NSPS fee will apply. <sup>2</sup> Only one NESHAP fee will apply. The Subpart ZZZZ NESH requirements by complying with NSPS, Subparts IIII and/or J. NSPS and NESHAP fees apply to new construction or if the so	JJJ.			
⊠ Responsible Official or Authorized Representative Signatus	re (if applicable)			
⊠ Single Source Determination Form (must be completed) –	Attachment A			
☐ Siting Criteria Waiver (if applicable) – Attachment B	□ Current Business Certificate – Attachment C			
□ Process Flow Diagram – Attachment D	□ Process Description – Attachment E			
□ Plot Plan – Attachment F	□ Area Map – Attachment G			
☐ G70-D Section Applicability Form – Attachment H	⊠ Emission Units/ERD Table – Attachment I			
☐ Fugitive Emissions Summary Sheet – Attachment J				
☐ Gas Well Affected Facility Data Sheet (if applicable) – Att	achment K			
<ul> <li>         ⊠ Storage Vessel(s) Data Sheet (include gas sample data, USEPA Tanks, simulation software (e.g. ProMax, E&amp;P Tanks, HYSYS, etc.), etc. where applicable) – Attachment L     </li> </ul>				
<ul> <li>         \[             \text{Natural Gas Fired Fuel Burning Unit(s) Data Sheet (GPUs, Heater Treaters, In-Line Heaters if applicable) − Attachment M         \[             \text{M}         \] </li> </ul>				
☐ Tanker Truck/Rail Car Loading Data Sheet (if applicable) - Attachment O				
☐ Glycol Dehydration Unit Data Sheet(s) (include wet gas analysis, GRI- GLYCalc <sup>TM</sup> input and output reports and information on reboiler if applicable) – Attachment P				
□ Pneumatic Controllers Data Sheet – Attachment Q				
⊠ Pneumatic Pump Data Sheet - Attachment R				
$\boxtimes$ Air Pollution Control Device/Emission Reduction Device(sapplicable) – Attachment S	) Sheet(s) (include manufacturer performance data sheet(s) if			
⊠ Emission Calculations (please be specific and include all calculation methodologies used) – Attachment T				
□ Facility-wide Emission Summary Sheet(s) – Attachment U				
⊠ Class I Legal Advertisement - Attachment V				
☑ One (1) paper copy and two (2) copies of CD or DVD with pdf copy of application and attachments				

All attachments must be identified by name, divided into sections, and submitted in order.

# ATTACHMENT A: SINGLE SOURCE DETERMINATION

#### ATTACHMENT A - SINGLE SOURCE DETERMINATION FORM

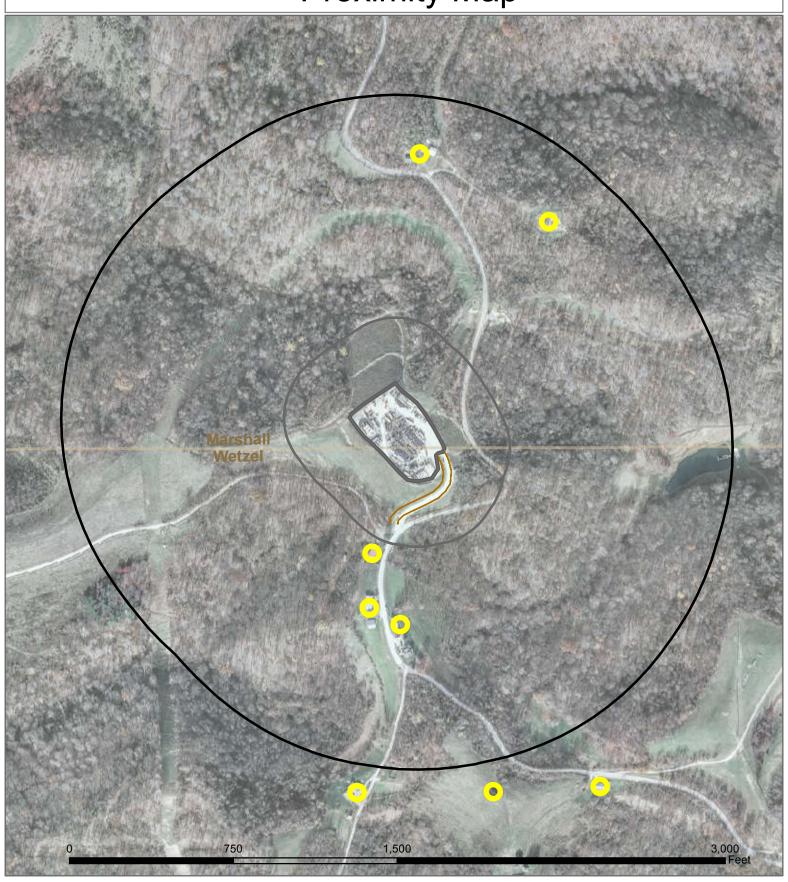
Classifying multiple facilities as one "stationary source" under 45CSR13, 45CSR14, and 45CSR19 is based on the definition of Building, structure, facility, or installation as given in §45-14-2.13 and §45-19-2.12. The definition states:

"Building, Structure, Facility, or Installation" means all of the pollutant-emitting activities which belong to the same industrial grouping, are located on one or more contiguous or adjacent properties, and are under the control of the same person (or persons under common control). Pollutant-emitting activities are a part of the same industrial grouping if they belong to the same "Major Group" (i.e., which have the same two (2)-digit code) as described in the Standard Industrial Classification Manual, 1987 (United States Government Printing Office stock number GPO 1987 0-185-718:QL 3).

The Source Determination Rule for the oil and gas industry was published in the Federal Register on June 3, 2016 and will become effective on August 2, 2016. EPA defined the term "adjacent" and stated that equipment and activities in the oil and gas sector that are under common control will be considered part of the same source if they are located on the same site or on sites that share equipment and are within ½ mile of each other.

Is there equely by SIC cod	sipment and activities in the same industrial grouping (defined e)?
Yes 🗆	No ⊠
Is there equ person/peop Yes □	
-	ipment and activities located on the same site or on sites that oment and are within ¼ mile of each other?  No   No

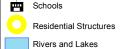
# **Proximity Map**





## **Bonnette Pad**

NAD83 UTM Zone 17N 524.714 4,396.876 Kilometers -80.711638 39.721404 Decimal Degrees



0.25 Mile Radius







# ATTACHMENT C: BUSINESS REGISTRATION CERTIFICATE

# **WEST VIRGINIA** STATE TAX DEPARTMENT

#### BUSINESS REGISTRATION

SSUED TO:

SWN PRODUCTION COMPANY, LLC 5400D BIG TYLER RD

CHARLESTON, WV 25313-1103

GISTRATION ACCOUNT NUMBE

2307-3731

UNE

accordance: With Chapter 11. Article 12, of the West Virginia Code

The person of organization identified on this certificate is registered to conduct business in the State of West-Virginia at the location above.

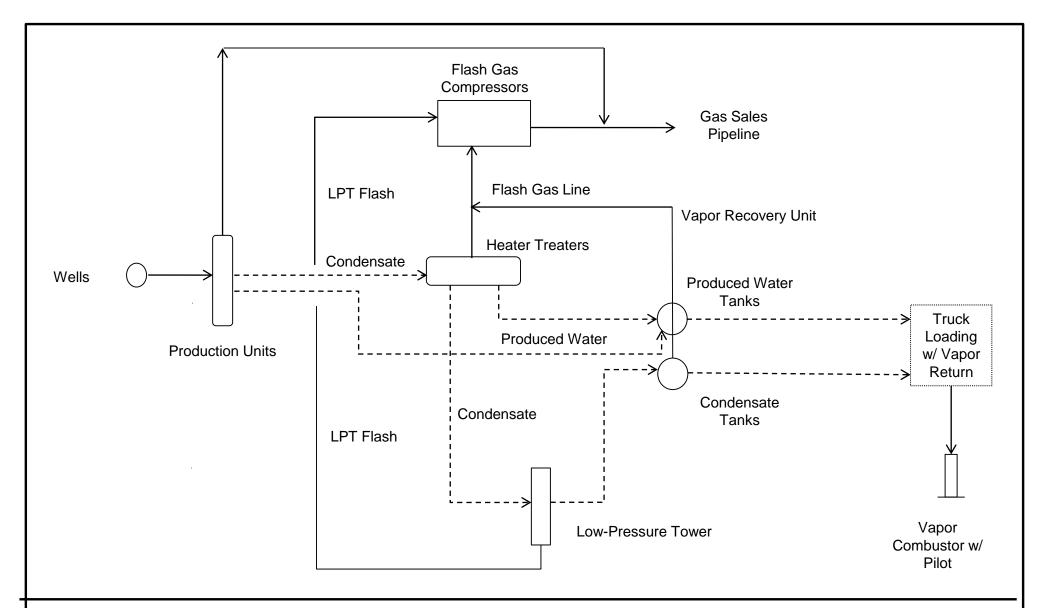
This certificate is not transferrable and must be displayed at the location for which issued This certificate shall be permanent until cessation of the business for which the certificate of registration was granted or until it is suspended, revoked or carricelled by the Tax Commissioner.

Change in name or change of location shall be considered a cessation of the business and a new certificate shall be required.

TRAVELING/STREET-VENDORS: Must-carry a copy of this certificate in every Vehicle operated by them. CONTRACTORS, DRILLING OPERATORS, TIMBER/LOGGING OPERATIONS: Must have a copy of this certificate displayed at every job site within West Virginia?

atL006 v.4 L1180094016

# ATTACHMENT D: PROCESS FLOW DIAGRAM



Gas/Vapor

Liquids (Condensate and Produced Water)

Note: Drawing is a depiction of general facility process and is not intended to represent facility and/or equipment layout.

SWN Production Company, LLC Bonnette MSH Pad

Attachment D: Process Flow Diagram February 2017

#### ATTACHMENT E: PROCESS DESCRIPTION

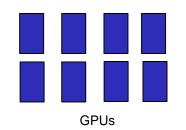
The facility is an oil and natural gas exploration and production facility, responsible for the production of natural gas. Storage of condensate and produced water also occur on-site. A description of the facility process is as follows: Condensate, gas and water come from the eight wellheads to the production units, where the first stage of separation occurs. Produced water is sent from the production units to the produced water tanks. Condensate and residual water are sent to the heater treaters. The flash from the heater treaters is captured via natural gasfired engine-driven flash gas compressors. Condensate and produced water from the heater treaters are routed to the storage tanks.

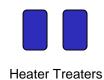
The natural gas stream exits the facility for transmission via pipeline. Condensate and produced water are transported offsite via truck. Loading emissions are controlled with vapor return, which has at least 70% capture efficiency, routed to the vapor combustor for at least 98% destruction efficiency. Working, breathing and flashing vapors from the condensate and produced water storage tanks are controlled by the VRU but are represented in the calculations as being controlled by the combustor for operational flexibility and as a conservative calculation of emissions. The vapor combustor will combust emissions with at least 98% efficiency. The vapor combustor has one (1) natural gas-fired pilot to ensure a constant flame for combustion.

A process flow diagram reflecting facility operations is shown in Attachment D.

# ATTACHMENT F: PLOT PLAN

Please note that the simple plot plan provided is only a representation of production/emissions equipment to be installed. Actual location specifications and equipment placement are not to scale.







Compressor Engines Wellheads





Low-Pressure Tower





Condensate/Produced Water Storage Tanks

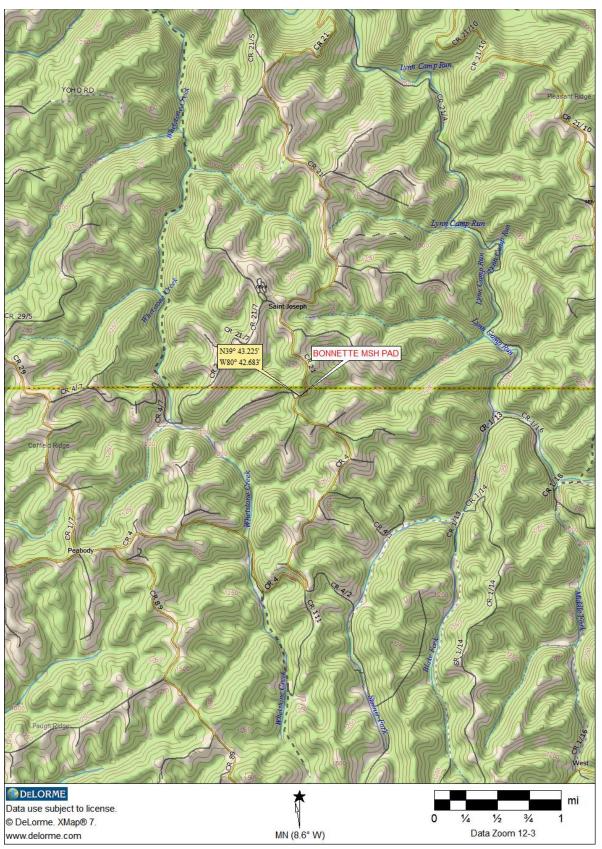
Nabot Coluprator

SWN Production Company, LLC Bonnette MSH Pad

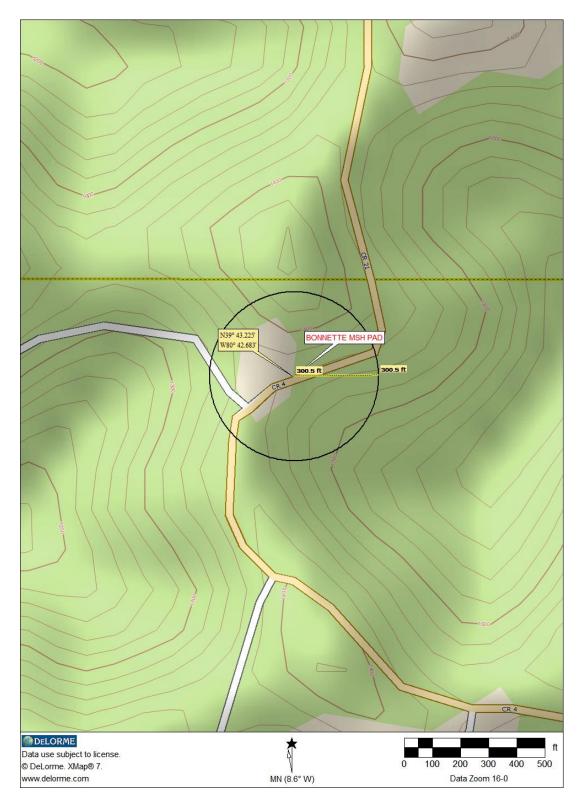
Attachment F: Simple Plot Plan February 2017

The equipment demonstrates general location layout and equipment counts may be different than what is shown.

# **ATTACHMENT G: AREA MAPS**



SWN Production Company, LLC Bonnette MSH Pad Attachment G: Area Map February 2017



#### **Bonnette MSH Pad**

Attachment G: Area Map with 300' Radius Wetzel County, West Virginia February 2017

## ATTACHMENT H: G70-D SECTION APPLICABILITY FORM

#### ATTACHMENT H - G70-D SECTION APPLICABILITY FORM

# General Permit G70-D Registration Section Applicability Form

General Permit G70-D was developed to allow qualified applicants to seek registration for a variety of sources. These sources include gas well affected facilities, storage vessels, gas production units, in-line heaters, heater treaters, glycol dehydration units and associated reboilers, pneumatic controllers, pneumatic pumps, reciprocating internal combustion engines (RICEs), tank truck/rail car loading, fugitive emissions, completion combustion devices, flares, enclosed combustion devices, and vapor recovery systems. All registered facilities will be subject to Sections 1.0, 2.0, 3.0, and 4.0.

General Permit G70-D allows the registrant to choose which sections of the permit they are seeking registration under. Therefore, please mark which additional sections that you are applying for registration under. If the applicant is seeking registration under multiple sections, please select all that apply. Please keep in mind, that if this registration is approved, the issued registration will state which sections will apply to your affected facility.

GENERAL PER	MIT G70-D APPLICABLE SECTIONS
⊠Section 5.0	Gas and Oil Well Affected Facility (NSPS, Subpart OOOO/OOOa)
⊠Section 6.0	Storage Vessels Containing Condensate and/or Produced Water <sup>1</sup>
□Section 7.0	Storage Vessel Affected Facility (NSPS, Subpart OOOO/OOOa)
⊠Section 8.0	Control Devices and Emission Reduction Devices not subject to NSPS Subpart OOOO/OOOoa and/or NESHAP Subpart HH
⊠Section 9.0	Small Heaters and Reboilers not subject to 40CFR60 Subpart Dc
□Section 10.0	Pneumatic Controllers Affected Facility (NSPS, Subpart OOOO/OOOa)
□Section 11.0	Pneumatic Pump Affected Facility (NSPS, Subpart OOOOa)
□Section 12.0	Fugitive Emissions GHG and VOC Standards (NSPS, Subpart OOOOa)
⊠Section 13.0	Reciprocating Internal Combustion Engines, Generator Engines
⊠Section 14.0	Tanker Truck/Rail Car Loading <sup>2</sup>
□Section 15.0	Glycol Dehydration Units <sup>3</sup>

Applicants that are subject to Section 6 may also be subject to Section 7 if the applicant is subject to the NSPS, Subparts OOOO or OOOOa control requirements or the applicable control device requirements of Section 8.

<sup>2</sup> Applicants that are subject to Section 14 may also be subject to control device and emission reduction device requirements of Section 8.

<sup>3</sup> Applicants that are subject to Section 15 may also be subject to the requirements of Section 9 (reboilers). Applicants that are subject to Section 15 may also be subject to control device and emission reduction device requirements of Section 8.

# ATTACHMENT I: EMISSIONS UNITS/ERD TABLE

#### ATTACHMENT I - EMISSION UNITS/EMISSION REDUCTION DEVICES (ERD) TABLE

Include ALL emission units and air pollution control devices/ERDs that will be part of this permit application review. Do not include fugitive emission sources in this table. Deminimis storage tanks shall be listed in the Attachment L table. This information is required for all sources regardless of whether it is a construction, modification, or administrative update.

modification, c	i dammingtrativ	upane.						
Emission Unit ID <sup>1</sup>	Emission Point ID <sup>2</sup>	Emission Unit Description	Year Installed	Manufac. Date <sup>3</sup>	Design Capacity	Type <sup>4</sup> and Date of Change	Control Device(s) <sup>5</sup>	ERD(s) <sup>6</sup>
		145-hp Caterpillar G3306 NA Engine w/						
EU-ENG1	EP-ENG1	Catalytic Converter	2016	2/13/2015	145-hp	Existing	NSCR	NSCR
		145-hp Caterpillar G3306 NA Engine w/		After				
EU-ENG2	EP-ENG2	Catalytic Converter	TBD	1/1/2011	145-hp	Existing	NSCR	NSCR
		·		after				
EU-ENG3	EP-ENG3	146.2-kw Bucks GM Vortec 5.7L Engine	TBD	1/1/2011	146.2-kW	Existing	N/A	N/A
EU-GPU1 to	EP-GPU1 -							
EU-GPU8	EP-GPU8	Eight (8) 1.0-mmBtu/hr GPU Burners	2016	N/A	1-mmBtu/hr	Existing	N/A	N/A
EU-HT1 to	EP-HT1 -							
EU-HT2	EP-HT2	Two (2) 0.5-mmBtu/hr Heater Treaters	2016	N/A	0.5-mmBtu/hr	Existing	N/A	N/A
EU-TANKS- COND	APC-COMB	Four (4) 400-bbl Condensate Tanks Routed to Vapor Combustor - Revise	3 - 2016; 1 - TBD	N/A	1,300-bbl/day	Modification	APC-COMB	APC-COMB
EU-TANKS- PW	APC-COMB	Four (4) 400-bbl Produced Water Tanks Routed to Vapor Combustor - Revise	3 - 2016; 1 - TBD	N/A	1,000-bbl/day	Modification	APC-COMB	APC-COMB
EU-LOAD-	EP-LOAD-	Condensate Truck Loading w/ Vapor Return			19,929,000			
COND	COND	Routed to Combustor	2016	N/A	gal/yr	Existing	APC-COMB	APC-COMB
EU-LOAD- PW	EP-LOAD- PW	Produced Water Truck Loading w/ Vapor Return Routed to Combustor	2016	N/A	15,330,000 gal/yr	Existing	APC-COMB	APC-COMB
		One (1) 15.0-mmBtu/hr Vapor Combustor -						
APC-COMB	APC-COMB	Tank/Loading Stream	2016	N/A	15-mmBtu/hr	Existing	N/A	N/A
EU-PILOT	APC-COMB		2016	N/A	50-scfh	Existing	N/A	N/A
EU-FUG	EP-FUG	Fugitive Emissions - Revise	2016	N/A	N/A	Modification	N/A	N/A
EU-HR	EP-HR	Fugitive Haul Road Emissions	2016	N/A	N/A	Existing	N/A	N/A
		<u> </u>		İ				

<sup>&</sup>lt;sup>1</sup> For Emission Units (or Sources) use the following numbering system:1S, 2S, 3S,... or other appropriate designation.

<sup>&</sup>lt;sup>2</sup> For Emission Points use the following numbering system:1E, 2E, 3E, ... or other appropriate designation.

<sup>&</sup>lt;sup>3</sup> When required by rule

<sup>&</sup>lt;sup>4</sup> New, modification, removal, existing

<sup>&</sup>lt;sup>5</sup> For Control Devices use the following numbering system: 1C, 2C, 3C,... or other appropriate designation.

<sup>&</sup>lt;sup>6</sup> For ERDs use the following numbering system: 1D, 2D, 3D,... or other appropriate designation.

### ATTACHMENT J: FUGITIVE EMISSIONS SUMMARY SHEET

Fugitive emissions at this site consist of haul road emissions, condensate and produced water loading operations, and equipment leaks.

	ATTACHMENT J – FUGITIVE EMISSIONS SUMMARY SHEET							
	Sources of fugitive emissions may include loading operations, equipment leaks, blowdown emissions, etc.  Use extra pages for each associated source or equipment if necessary.							
	Source/Equip	nent: EU-FU	G					_
	Leak Detectio Method Used		Audible, visual, and factory (AVO) inspections	☐ Infrared (FLIR) cameras	☐ Other (plea	se describe)		☐ None required
Compone	ent Closed		Source of	f Leak Factors	Stream type		Estimated Emissions (tpy)	
Type	System	Count		her (specify))	(gas, liquid, etc.)	VOC	HAP	GHG (methane, CO <sub>2</sub> e)
Pumps	☐ Yes ☐ No				☐ Gas ☐ Liquid ☐ Both			
Valves	☐ Yes ⊠ No	144 – gas 106 - LL	EPA		☐ Gas ☐ Liquid ☒ Both	1.51 – gas 2.41 – LL	0.03 – gas 0.21 - LL	81.35 – gas 1.17 - LL
Safety Rel Valves	ief ☐ Yes ⊠ No	43	EPA		⊠ Gas □ Liquid □ Both	0.88	0.02	47.30
Open Endo Lines	ed				☐ Gas ☐ Liquid ☐ Both			
Sampling Connectio	ns				☐ Gas ☐ Liquid ☐ Both			
Connectio (Not sample	I IXI NO	418	EPA		☐ Gas ⊠ Liquid ☐ Both	0.80	0.07	0.38
Compresso	☐ Yes ⊠ No	9	EPA		⊠ Gas □ Liquid □ Both	0.18	<0.01	9.62
Flanges	☐ Yes ⊠ No	571	EPA		⊠ Gas □ Liquid □ Both	0.52	0.01	27.94
Other <sup>1</sup>	☐ Yes ☐ No				☐ Gas ☐ Liquid ☐ Both			
				diaphragms, drains, meters, etc.				
Please provide an explanation of the sources of fugitive emissions (e.g. pigging operations, equipment blowdowns, pneumatic controllers, etc.): Equipment leaks								

Please indicate if there are any closed vent bypasses (include component): N/A

Specify all equipment used in the closed vent system (e.g. VRU, ERD, thief hatches, tanker truck/rail car loading, etc.) N/A

TABLE 2-4. OIL AND GAS PRODUCTION OPERATIONS AVERAGE EMISSION FACTORS (kg/hr/source)

Equipment Type	Service <sup>a</sup>	Emission Factor (kg/hr/source)b
Valves	Gas Heavy Oil Light Oil Water/Oil	4.5E-03 8.4E-06 2.5E-03 9.8E-05
Pump seals	Gas Heavy Oil Light Oil Water/Oil	2.4E-03 NA 1.3E-02 2.4E-05
Others <sup>C</sup>	Gas Heavy Oil Light Oil Water/Oil	8.8E-03 3.2E-05 7.5E-03 1.4E-02
Connectors	Gas Heavy Oil Light Oil Water/Oil	2.0E-04 7.5E-06 2.1E-04 1.1E-04
Flanges	Gas Heavy Oil Light Oil Water/Oil	3.9E-04 3.9E-07 1.1E-04 2.9E-06
Open-ended lines	Gas Heavy Oil Light Oil Water/Oil	2.0E-03 1.4E-04 1.4E-03 2.5E-04

<sup>&</sup>lt;sup>a</sup>Water/Oil emission factors apply to water streams in oil service with a water content greater than 50%, from the point of origin to the point where the water content reaches 99%. For water streams with a water content greater than 99%, the emission rate is considered negligible.

bThese factors are for total organic compound emission rates (including non-VOC's such as methane and ethane) and apply to light crude, heavy crude, gas plant, gas production, and off shore facilities. "NA" indicates that not enough data were available to develop the indicated emission factor.

CThe "other" equipment type was derived from compressors, diaphrams, drains, dump arms, hatches, instruments, meters, pressure relief valves, polished rods, relief valves, and vents. This "other" equipment type should be applied for any equipment type other than connectors, flanges, open-ended lines, pumps, or valves.

## ATTACHMENT K: GAS WELL AFFECTED FACILITY DATA SHEET

#### ATTACHMENT K – GAS WELL AFFECTED FACILITY DATA SHEET

Complete this data sheet if you are the owner or operator of a gas well affected facility for which construction, modification or reconstruction commenced after August 23, 2011. This form must be completed for natural gas well affected facilities regardless of when flowback operations occur (or have occurred).

API Number	Date of Flowback	Date of Well Completion	Green Completion and/or Combustion Device	Subject to OOOO or OOOOa?
047-051-01326	6/27/2012	5/19/2012	Green Completion	0000
047-051-01308	6/26/2012	5/29/2012	Green Completion	0000
047-051-01832	12/19/2015	12/15/2015	Green Completion	0000a
047-051-01831	12/19/2015	12/8/2015	Green Completion	0000a
047-051-01830	12/20/2015	12/12/2015	Green Completion	0000a
047-051-01827	12/19/2015	12/13/2015	Green Completion	0000a
047-051-01828	12/19/2015	12/10/2015	Green Completion	0000a
047-051-01829	12/19/2015	12/17/2015	Green Completion	OOOOa

Note: If future wells are planned and no API number is available please list as PLANNED.

If there are existing wells that commenced construction prior to August 23, 2011, please acknowledge as existing.

This is the same API (American Petroleum Institute) well number(s) provided in the well completion notification and as provided to the WVDEP, Office of Oil and Gas for the well permit. The API number may be provided on the application without the state code (047).

Every oil and gas well permitted in West Virginia since 1929 has been issued an API number. This API is used by agencies to identify and track oil and gas wells.

The API number has the following format: 047-001-00001

Where,

047 = State code. The state code for WV is 047.

001 = County Code. County codes are odd numbers, beginning with 001

(Barbour) and continuing to 109 (Wyoming).

00001= Well number. Each well will have a unique well number.

### ATTACHMENT L: STORAGE VESSELS DATA SHEET

REPRESENTATIVE GAS ANALYSES
PROMAX PROCESS SIMULATION RESULTS
TANKS 4.0.9D REPORTS
AP-42 AND EPA EMISSION FACTORS

#### ATTACHMENT L – STORAGE VESSEL DATA SHEET

Complete this data sheet if you are the owner or operator of a storage vessel that contains condensate and/or produced water. This form must be completed for *each* new or modified bulk liquid storage vessel(s) that contains condensate and/or produced water. (If you have more than one (1) identical tank (i.e. 4-400 bbl condensate tanks), then you can list all on one (1) data sheet). Include gas sample analysis, flashing emissions, working and breathing losses, USEPA Tanks, simulation software (ProMax, E&P Tanks, HYSYS, etc.), and any other supporting documents where applicable.

#### The following information is REQUIRED:

- ☑ Composition of the representative sample used for the simulation
- - □ Temperature and pressure (inlet and outlet from separator(s))
- ⊠ Resulting flash emission factor or flashing emissions from simulation
- ⊠ Working/breathing loss emissions from tanks and/or loading emissions if simulation is used to quantify those emissions

Additional information may be requested if necessary.

#### GENERAL INFORMATION (REQUIRED)

Bulk Storage Area Name	2. Tank Name
Condensate Storage	Four (4) 400-bbl Condensate Storage Tanks
3. Emission Unit ID number	4. Emission Point ID number
EU-TANKS-COND	APC-COMB
5. Date Installed , Modified or Relocated (for existing tanks)	6. Type of change:
3 – 2016; 1 - TBD	$\square$ New construction $\square$ New stored material $\boxtimes$ Other
Was the tank manufactured after August 23, 2011 and on or	☐ Relocation
before September 18, 2015?	
⊠ Yes □ No	
Was the tank manufactured after September 18, 2015?	
⊠ Yes □ No	
7A. Description of Tank Modification (if applicable) Quantity of	f tanks.
7B. Will more than one material be stored in this tank? If so, a s	separate form must be completed for each material.
□ Yes ⊠ No	
7C. Was USEPA Tanks simulation software utilized?	
⊠ Yes □ No	
If Yes, please provide the appropriate documentation and items	8-42 below are not required.

Bulk Storage Area Name	2. Tank Name
Produced Water Storage	Four (4) 400-bbl Produced Water Storage Tanks
3. Emission Unit ID number	4. Emission Point ID number
EU-TANKS-PW	APC-COMB
5. Date Installed , Modified or Relocated (for existing tanks)	6. Type of change:
3 – 2016: 1 - TBD	$\square$ New construction $\square$ New stored material $\boxtimes$ Other
Was the tank manufactured after August 23, 2011 and on or	☐ Relocation
before September 18, 2015?	
⊠ Yes □ No	
Was the tank manufactured after September 18, 2015?	
⊠ Yes □ No	
7A. Description of Tank Modification (if applicable) Quantity of	f tanks.
7B. Will more than one material be stored in this tank? If so, a s	separate form must be completed for each material.
□ Yes ⊠ No	
7C. Was USEPA Tanks simulation software utilized?	
⊠ Yes □ No	
If Yes, please provide the appropriate documentation and items	8-42 below are not required.

### STORAGE TANK DATA TABLE

#### List all deminimis storage tanks (i.e. lube oil, glycol, diesel etc.)

Source			
ID # <sup>1</sup>	Status <sup>2</sup>	Content <sup>3</sup>	Volume <sup>4</sup>
EU-TANKS-LUBEOIL	EXIST	Lube Oil	50 gal
EU-TANKS-LUBEOIL	NEW	Lube Oil	50 gal
EU-TANKS-METHANOL	EXIST	Methanol	50 gal
EU-TANKS-METHANOL	EXIST	Methanol	50 gal
EU-TANKS-METHANOL	EXIST	Methanol	50 gal
EU-TANKS-METHANOL	EXIST	Methanol	50 gal
EU-TANKS-METHANOL	EXIST	Methanol	50 gal
EU-TANKS-METHANOL	EXIST	Methanol	50 gal
EU-TANKS-METHANOL	EXIST	Methanol	50 gal
EU-TANKS-METHANOL	EXIST	Methanol	50 gal
EU-TANKS-METHANOL	EXIST	Methanol	50 gal
EU-TANKS-METHANOL	EXIST	Methanol	50 gal

- Enter the appropriate Source Identification Numbers (Source ID #) for each storage tank located at the well site. Tanks should 1. be designated T01, T02, T03, etc.
- 2. Enter storage tank Status using the following:

EXIST Existing Equipment

NEW Installation of New Equipment

REM Equipment Removed

- Enter storage tank content such as condensate, pipeline liquids, glycol (DEG or TEG), lube oil, diesel, mercaptan etc. Enter the maximum design storage tank volume in gallons.
- 3. 4.

# **TABLE 1-B**

# COMPOSITIONAL ANALYSIS OF THE SEPARATOR GAS, OIL AND MATHEMATICALLY RECOMBINED WELLSTREAM THROUGH $C_{11 \scriptscriptstyle +}$

SEPARATOR GOR...... 16357 Scf/Sep Bbl

SEPARATOR PRESSURE...... 390 psig SEPARATOR TEMPERATURE.....: 83 °F

	SEPARA	TOR GAS	SEPARA	TOR OIL	WELLS'	WELLSTREAM		
		*		Liquid		*		
Component	Mole%	GPM	Mole %	Volume %	Mole %	GPM		
Hydrogen Sulfide	0.000	0.000	0.000	0.000	0.000	0.000		
Nitrogen	0.513	0.000	0.026	0.008	0.483	0.000		
Carbon Dioxide	0.149	0.000	0.013	0.006	0.140	0.000		
Methane	71.427	0.000	8.861	3.883	67.513	0.000		
Ethane	17.491	4.716	9.965	6.891	17.020	4.589		
Propane	6.802	1.887	11.708	8.331	7.109	1.972		
Iso-butane	0.668	0.220	2.480	2.097	0.781	0.258		
N-butane	1.828	0.581	9.597	7.820	2.314	0.735		
2-2 Dimethylpropane	0.008	0.003	0.080	0.079	0.012	0.005		
Iso-pentane	0.316	0.117	3.603	3.409	0.522	0.192		
N-pentane	0.440	0.161	6.541	6.127	0.822	0.300		
2-2 Dimethylbutane	0.005	0.002	0.123	0.133	0.012	0.005		
Cyclopentane	0.003	0.001	0.000	0.000	0.003	0.001		
2-3 Dimethylbutane	0.009	0.004	0.351	0.372	0.030	0.013		
2 Methylpentane	0.065	0.027	2.260	2.425	0.202	0.085		
3 Methylpentane	0.038	0.016	1.493	1.575	0.129	0.053		
Other Hexanes	0.000	0.000	0.000	0.000	0.000	0.000		
n-Hexane	0.107	0.044	5.195	5.523	0.425	0.176		
Methylcyclopentane	0.008	0.003	0.422	0.386	0.034	0.012		
Benzene	0.001	0.000	0.069	0.050	0.005	0.001		
Cyclohexane	0.010	0.003	0.744	0.655	0.056	0.019		
2-Methylhexane	0.014	0.007	1.868	2.245	0.130	0.061		
3-Methylhexane	0.015	0.007	1.690	2.006	0.120	0.055		
2,2,4 Trimethylpentane	0.000	0.000	0.000	0.000	0.000	0.000		
Other Heptanes	0.013	0.006	0.902	1.015	0.069	0.030		
n-Heptane	0.025	0.012	3.836	4.576	0.263	0.123		
Methylcyclohexane	0.011	0.004	1.712	1.779	0.117	0.048		
Toluene	0.002	0.001	0.328	0.284	0.022	0.008		
Other C-8's	0.017	0.008	5.124	6.211	0.336	0.159		
n-Octane	0.005	0.003	2.442	3.234	0.157	0.081		
Ethylbenzene	0.000	0.000	0.307	0.306	0.019	0.007		
M&P-Xylene	0.001	0.000	0.359	0.360	0.023	0.009		
O-Xylene	0.000	0.000	0.685	0.673	0.043	0.016		
Other C-9's	0.005	0.003	3.105	4.203	0.199	0.105		
n-Nonane	0.001	0.001	1.492	2.172	0.094	0.053		
Other C10's	0.002	0.001	3.126	4.651	0.197	0.115		
n-Decane	0.000	0.000	0.894	1.419	0.056	0.035		
Undecanes Plus	0.001	0.001	8.599	15.098	0.539	0.369		
TOTAL	100.000	7.837	100.000	100.000	100.000	9.690		

## **TABLE 1-B**

# COMPOSITIONAL ANALYSIS OF THE SEPARATOR GAS, OIL AND MATHEMATICALLY RECOMBINED WELLSTREAM THROUGH $C_{11+}$

SEPARATOR GOR...... 16357 Scf/Sep Bbl

SEPARATOR PRESSURE....... 390 psig SEPARATOR TEMPERATURE.....: 83 °F

UNDECANES PLUS (C <sub>11+</sub> ) FRACTION CHARACTERISTICS									
	Specific	Gravity	Molecular Weight	Vapor Volume	Gross Heating Value				
COMPONENT	°API	**	lb/lb-mole	Scf/Gal	***				
Gas	N/A	0.8250	156.000	16.558	8,400				
Oil	42.783	0.8119	174.000	14.609	128,920				
Wellstream	N/A	0.8119	173.968	14.612	N/A				

TOTAL SAMPLE CHARACTERISTICS									
Molecular Vapor Gross Hea									
	Specific	Specific Gravity		Volume	Dry	Saturated			
COMPONENT	°API	**	lb/lb-mole	Scf/Gal	***	***			
Gas	N/A	0.7718	22.258	127.606	1,352	1,330			
Oil	84.980	0.6536	79.788	25.649	N/A	111,577			
Wellstream	N/A	0.8928	25.856	46.942	N/A	N/A			

<sup>\*</sup> GPM (gallons per Mscf) determined at 14.85 psia and 60 °F

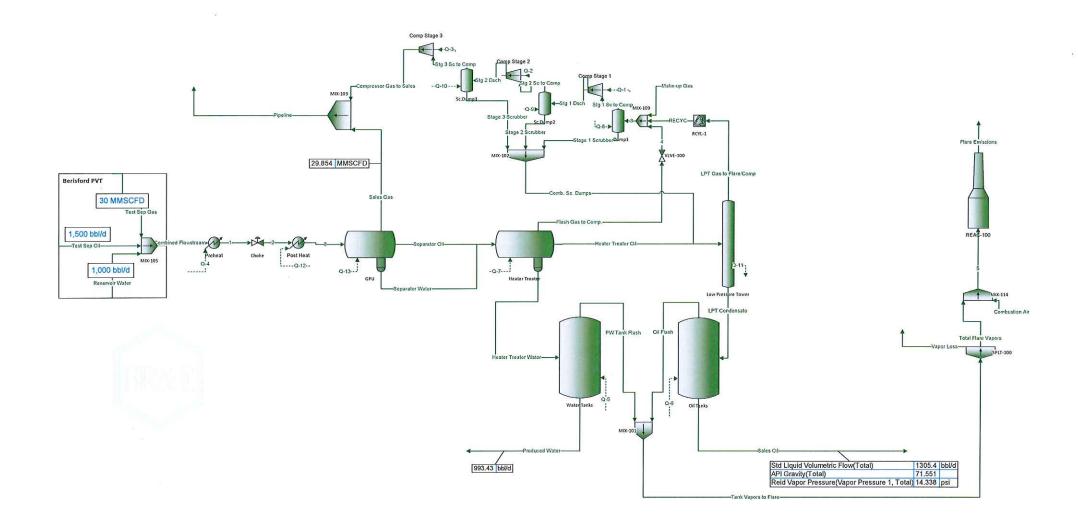
<sup>\*\*</sup> Gas specific gravity and wellstream specific gravity determined relative to air (SG=1.000). Oil specific gravity determined relative to water (SG=1.000).

<sup>\*\*\*</sup> Gross Heating Value units for gas (real basis) and oil are BTU/Scf and BTU/Gal, respectively.

Names	Units	Test Sep Gas	Test Sep Oil	Reservoir Water	Oil Flash	PW Tank Flash	Sales Gas	Sales Oil	Produced Water
Temperature	°F	94*	94*	94*	80#	85	75*	80	85#
Pressure	psia	429.7*	429.7*	429.7*	15.196	15.196	364.7*	15.196*	15.196*
Mole Fraction Vapor	%	100	0	0	100	100	100	0	0
Mole Fraction Light Liquid	%	0	100	100	0	0	0	99.527	100
Mole Fraction Heavy Liquid	%	0	0	0	0	0	0	0.47271	0
Molecular Weight	lb/lbmol	21.075	79.801	18.015	50.028	31.618	20.813	97.737	18.016
Molar Flow	lbmol/h	3293.9	176.74	809.87	3.047	0.04399	3277.9	134.69	804.48
Mass Flow	lb/h	69420	14104	14590	152.44	1.3909	68224	13164	14493
Enthalpy	Btu/h	-1.1354e+008	-1.3654e+007	-9.9267e+007	-1.5809e+005	-1865.3	-1.1329e+008	-1.2286e+007	-9.8749e+007
Nitrogen(Mole Fraction)	%	0.433*	0.073002*	0*	0.00051735	0.041366	0.43794	8.1698e-007	4.762e-007
CO2(Mole Fraction)	%	0.18*	0.043001*	0*	0.058611	0.60294	0.17915	0.00089836	0.00027438
C1(Mole Fraction)	%	77.38*	10.266*	0*	1.9277	35.691	77.726	0.0099296	0.00084197
C2(Mole Fraction)	%	14.005*	9.0163*	0*	17.807	28.516	14.005	0.56961	0.00076479
C3(Mole Fraction)	%	4.82*	9.0733*	0*	32.635	18.617	4.7411	3.6917	0.00051838
n-Butane(Mole Fraction)	%	1.329*	7.3102*	0*	18.949	6.9592	1.2326	7.8149	0.00015397
n-Butane(Mole Fraction)	%	1.329*	7.3102*	0*	18.949	6.9592	1.2326	7.8149	0.00015397
2,2-Dimethylpropane(Mole Fraction)	%	0.018*	0.085003*	0*	0.24493	0.041042	0.014898	0.13735	3.9702e-007
Isopentane(Mole Fraction)	%	0.35*	4.1431*	0*	5.4477	1.3053	0.29939	5.7094	1.9096e-005
n-Pentane(Mole Fraction)	%	0.366*	5.5072*	0*	5.6401	1.4694	0.30144	7.8757	2.188e-005

Oil Flash Factor – 4.50 lb/bbl

Produced water – 0.03 lb/bbl



#### **TANKS 4.0.9d**

# **Emissions Report - Summary Format Tank Indentification and Physical Characteristics**

Identification

User Identification: Bonnette MSH Pad - Condensate

City:

State: West Virginia

Company: SWN Production Company, LLC

Type of Tank: Vertical Fixed Roof Tank

Description: One (1) of four (4) 400-bbl condensate tanks modeled as Gasoline RVP 10.

**Tank Dimensions** 

 Shell Height (ft):
 20.00

 Diameter (ft):
 12.00

 Liquid Height (ft):
 19.00

 Avg. Liquid Height (ft):
 10.00

 Volume (gallons):
 16,074.56

 Turnovers:
 309.95

 Net Throughput(gal/yr):
 4,982,250.00

Is Tank Heated (y/n): N

**Paint Characteristics** 

Shell Color/Shade: White/White
Shell Condition Good
Roof Color/Shade: White/White
Roof Condition: Good

**Roof Characteristics** 

Type: Cone

Height (ft) 0.00 Slope (ft/ft) (Cone Roof) 0.06

**Breather Vent Settings** 

Vacuum Settings (psig): -0.03 Pressure Settings (psig) 0.03

Meterological Data used in Emissions Calculations: Pittsburgh, Pennsylvania (Avg Atmospheric Pressure = 14.11 psia)

### **TANKS 4.0.9d**

# **Emissions Report - Summary Format Liquid Contents of Storage Tank**

#### Bonnette MSH Pad - Condensate - Vertical Fixed Roof Tank

			aily Liquid S		Liquid Bulk Temp	Van	or Pressure	(neia)	Vapor Mol.	Liquid	Vapor Mass	Mol.	Basis for Vapor Pressure
Mixture/Component	Month	Avg.	Min.	Max.	(deg F)	Avg.	Min.	(psia) Max.	Weight.	Mass Fract.	Fract.	Weight	Calculations
Bonnette MSH Pad - Gantzer PVT	All	51.94	47.06	56.81	50.33	7.3119	6.7359	7.9250	50.0280			97.74	Option 4: RVP=10.86

# TANKS 4.0.9d Emissions Report - Summary Format Individual Tank Emission Totals

**Emissions Report for: Annual** 

#### Bonnette MSH Pad - Condensate - Vertical Fixed Roof Tank

	Losses(lbs)							
Components	Working Loss	Breathing Loss	Total Emissions					
Bonnette MSH Pad - Gantzer PVT	8,574.22	1,155.38	9,729.59					

#### **TANKS 4.0.9d**

# **Emissions Report - Summary Format Tank Indentification and Physical Characteristics**

Identification

User Identification: Bonnette MSH Pad - Produced Water

City:

State: West Virginia

Company: SWN Production Company, LLC

Type of Tank: Vertical Fixed Roof Tank

Description: One (1) of four (4) 400-bbl produced water tanks modeled as 1% Gasoline RVP 11 and 99% water.

**Tank Dimensions** 

 Shell Height (ft):
 20.00

 Diameter (ft):
 12.00

 Liquid Height (ft):
 19.00

 Avg. Liquid Height (ft):
 10.00

 Volume (gallons):
 16,074.56

 Turnovers:
 238.42

 Net Throughput(gal/yr):
 3,832,500.00

Is Tank Heated (y/n): N

**Paint Characteristics** 

Shell Color/Shade: White/White
Shell Condition Good
Roof Color/Shade: White/White
Roof Condition: Good

**Roof Characteristics** 

Type: Cone

Height (ft) 0.00 Slope (ft/ft) (Cone Roof) 0.06

**Breather Vent Settings** 

Vacuum Settings (psig): -0.03 Pressure Settings (psig) 0.03

Meterological Data used in Emissions Calculations: Pittsburgh, Pennsylvania (Avg Atmospheric Pressure = 14.11 psia)

# TANKS 4.0.9d Emissions Report - Summary Format Liquid Contents of Storage Tank

#### Bonnette MSH Pad - Produced Water - Vertical Fixed Roof Tank

			nily Liquid S perature (d		Liquid Bulk Temp	Vapo	r Pressure	(psia)	Vapor Mol.	Liquid Mass	Vapor Mass	Mol.	Basis for Vapor Pressure
Mixture/Component	Month	Avg.	Min.	Max.	(deg F)	Avg.	Min.	Max.	Weight.	Fract.	Fract.	Weight	Calculations
Produced Water	All	51.94	47.06	56.81	50.33	0.2043	0.1714	0.2427	20.1493			18.17	
Bonnette MSH Pad - Gantzer PVT						7.3119	6.7359	7.9250	50.0280	0.0100	0.1652	97.74	Option 4: RVP=10.86
Water						0.1911	0.1592	0.2284	18.0200	0.9900	0.8348	18.02	Option 2: A=8.10765, B=1750.286, C=235

# TANKS 4.0.9d Emissions Report - Summary Format Individual Tank Emission Totals

**Emissions Report for: Annual** 

#### Bonnette MSH Pad - Produced Water - Vertical Fixed Roof Tank

	Losses(lbs)						
Components	Working Loss	Breathing Loss	Total Emissions				
Produced Water	82.41	11.00	93.41				
Water	68.80	9.19	77.98				
Bonnette MSH Pad - Gantzer PVT	13.61	1.82	15.43				

### ATTACHMENT M: NATURAL GAS FIRED FUEL BURNING UNITS DATA SHEET

AP-42 EMISSION FACTORS

# ATTACHMENT M – SMALL HEATERS AND REBOILERS NOT SUBJECT TO 40CFR60 SUBPART DC DATA SHEET

Complete this data sheet for each small heater and reboiler not subject to 40CFR60 Subpart Dc at the facility. The Maximum Design Heat Input (MDHI) must be less than 10 MMBTU/hr.

Emission Unit ID# <sup>1</sup>	Emission Point ID# <sup>2</sup>	Emission Unit Description (manufacturer, model #)	Year Installed/ Modified	Type <sup>3</sup> and Date of Change	Maximum Design Heat Input (MMBTU/hr) <sup>4</sup>	Fuel Heating Value (BTU/scf) <sup>5</sup>
EU-GPU1	EP-GPU1	Gas Production Unit Burner	2016	Existing	1.0	905
EU-GPU2	EP-GPU2	Gas Production Unit Burner	2016	Existing	1.0	905
EU-GPU3	EP-GPU3	Gas Production Unit Burner	2016	Existing	1.0	905
EU-GPU4	EP-GPU4	Gas Production Unit Burner	2016	Existing	1.0	905
EU-GPU5	EP-GPU5	Gas Production Unit Burner	2016	Existing	1.0	905
EU-GPU6	EP-GPU6	Gas Production Unit Burner	2016	Existing	1.0	905
EU-GPU7	EP-GPU7	Gas Production Unit Burner	2016	Existing	1.0	905
EU-GPU8	EP-GPU8	Gas Production Unit Burner	2016	Existing	1.0	905
EU-HT1	EP-HT1	Heater Treater	2016	Existing	0.5	905
EU-HT2	EP-HT2	Heater Treater	2016	Existing	0.5	905

- Enter the appropriate Emission Unit (or Source) identification number for each fuel burning unit located at the production pad. Gas Producing Unit Burners should be designated GPU-1, GPU-2, etc. Heater Treaters should be designated HT-1, HT-2, etc. Heaters or Line Heaters should be designated LH-1, LH-2, etc. For sources, use 1S, 2S, 3S...or other appropriate designation. Enter glycol dehydration unit Reboiler Vent data on the Glycol Dehydration Unit Data Sheet.
- Enter the appropriate Emission Point identification numbers for each fuel burning unit located at the production pad. Gas Producing Unit Burners should be designated GPU-1, GPU-2, etc. Heater Treaters should be designated HT-1, HT-2, etc. Heaters or Line Heaters should be designated LH-1, LH-2, etc. For emission points, use 1E, 2E, 3E...or other appropriate designation.
- New, modification, removal
- Enter design heat input capacity in MMBtu/hr.
- 5 Enter the fuel heating value in BTU/standard cubic foot.

Table 1.4-1. EMISSION FACTORS FOR NITROGEN OXIDES (NO<sub>x</sub>) AND CARBON MONOXIDE (CO) FROM NATURAL GAS COMBUSTION<sup>a</sup>

	N	O <sub>x</sub> <sup>b</sup>		СО
Combustor Type (MMBtu/hr Heat Input) [SCC]	Emission Factor (lb/10 <sup>6</sup> scf)	Emission Factor Rating	Emission Factor (lb/10 <sup>6</sup> scf)	Emission Factor Rating
Large Wall-Fired Boilers (>100) [1-01-006-01, 1-02-006-01, 1-03-006-01]				
Uncontrolled (Pre-NSPS) <sup>c</sup>	280	A	84	В
Uncontrolled (Post-NSPS) <sup>c</sup>	190	A	84	В
Controlled - Low NO <sub>x</sub> burners	140	A	84	В
Controlled - Flue gas recirculation	100	D	84	В
Small Boilers (<100) [1-01-006-02, 1-02-006-02, 1-03-006-02, 1-03-006-03]				
Uncontrolled	100	В	84	В
Controlled - Low NO <sub>x</sub> burners	50	D	84	В
Controlled - Low NO <sub>x</sub> burners/Flue gas recirculation	32	C	84	В
Tangential-Fired Boilers (All Sizes) [1-01-006-04]				
Uncontrolled	170	A	24	C
Controlled - Flue gas recirculation	76	D	98	D
Residential Furnaces (<0.3) [No SCC]				
Uncontrolled	94	В	40	В

<sup>&</sup>lt;sup>a</sup> Reference 11. Units are in pounds of pollutant per million standard cubic feet of natural gas fired. To convert from lb/10 <sup>6</sup> scf to kg/10<sup>6</sup> m<sup>3</sup>, multiply by 16. Emission factors are based on an average natural gas higher heating value of 1,020 Btu/scf. To convert from 1b/10 <sup>6</sup> scf to lb/MMBtu, divide by 1,020. The emission factors in this table may be converted to other natural gas heating values by multiplying the given emission factor by the ratio of the specified heating value to this average heating value. SCC = Source Classification Code. ND = no data. NA = not applicable.

b Expressed as NO<sub>2</sub>. For large and small wall fired boilers with SNCR control, apply a 24 percent reduction to the appropriate NO<sub>X</sub> emission factor. For

tangential-fired boilers with SNCR control, apply a 13 percent reduction to the appropriate NO x emission factor.

NSPS=New Source Performance Standard as defined in 40 CFR 60 Subparts D and Db. Post-NSPS units are boilers with greater than 250 MMBtu/hr of heat input that commenced construction modification, or reconstruction after August 17, 1971, and units with heat input capacities between 100 and 250 MMBtu/hr that commenced construction modification, or reconstruction after June 19, 1984.

TABLE 1.4-3. EMISSION FACTORS FOR SPECIATED ORGANIC COMPOUNDS FROM NATURAL GAS COMBUSTION  $^{\rm a}$ 

CAS No.	Pollutant	Emission Factor (lb/10 <sup>6</sup> scf)	Emission Factor Rating
91-57-6	2-Methylnaphthalene <sup>b, c</sup>	2.4E-05	D
56-49-5	3-Methylchloranthrene <sup>b, c</sup>	<1.8E-06	E
	7,12-Dimethylbenz(a)anthracene <sup>b,c</sup>	<1.6E-05	E
83-32-9	Acenaphthene <sup>b,c</sup>	<1.8E-06	E
203-96-8	Acenaphthylene <sup>b,c</sup>	<1.8E-06	E
120-12-7	Anthracene <sup>b,c</sup>	<2.4E-06	E
56-55-3	Benz(a)anthracene <sup>b,c</sup>	<1.8E-06	E
71-43-2	Benzene <sup>b</sup>	2.1E-03	В
50-32-8	Benzo(a)pyrene <sup>b,c</sup>	<1.2E-06	E
205-99-2	Benzo(b)fluoranthene <sup>b,c</sup>	<1.8E-06	E
191-24-2	Benzo(g,h,i)perylene <sup>b,c</sup>	<1.2E-06	Е
205-82-3	Benzo(k)fluoranthene <sup>b,c</sup>	<1.8E-06	Е
106-97-8	Butane	2.1E+00	Е
218-01-9	Chrysene <sup>b,c</sup>	<1.8E-06	Е
53-70-3	Dibenzo(a,h)anthracene <sup>b,c</sup>	<1.2E-06	Е
25321-22-6	Dichlorobenzene <sup>b</sup>	1.2E-03	E
74-84-0	Ethane	3.1E+00	Е
206-44-0	Fluoranthene <sup>b,c</sup>	3.0E-06	Е
86-73-7	Fluorene <sup>b,c</sup>	2.8E-06	Е
50-00-0	Formaldehyde <sup>b</sup>	7.5E-02	В
110-54-3	Hexane <sup>b</sup>	1.8E+00	Е
193-39-5	Indeno(1,2,3-cd)pyrene <sup>b,c</sup>	<1.8E-06	Е
91-20-3	Naphthalene <sup>b</sup>	6.1E-04	E
109-66-0	Pentane	2.6E+00	E
85-01-8	Phenanathrene <sup>b,c</sup>	1.7E-05	D

TABLE 1.4-3. EMISSION FACTORS FOR SPECIATED ORGANIC COMPOUNDS FROM NATURAL GAS COMBUSTION (Continued)

CAS No.	Pollutant	Emission Factor (lb/10 <sup>6</sup> scf)	Emission Factor Rating
74-98-6	Propane	1.6E+00	Е
129-00-0	Pyrene <sup>b, c</sup>	5.0E-06	E
108-88-3	Toluene <sup>b</sup>	3.4E-03	С

<sup>&</sup>lt;sup>a</sup> Reference 11. Units are in pounds of pollutant per million standard cubic feet of natural gas fired. Data are for all natural gas combustion sources. To convert from lb/10<sup>6</sup> scf to kg/10<sup>6</sup> m³, multiply by 16. To convert from 1b/10<sup>6</sup> scf to lb/MMBtu, divide by 1,020. Emission Factors preceded with a less-than symbol are based on method detection limits.

<sup>&</sup>lt;sup>b</sup> Hazardous Air Pollutant (HAP) as defined by Section 112(b) of the Clean Air Act.

<sup>&</sup>lt;sup>c</sup> HAP because it is Polycyclic Organic Matter (POM). POM is a HAP as defined by Section 112(b) of the Clean Air Act.

<sup>&</sup>lt;sup>d</sup> The sum of individual organic compounds may exceed the VOC and TOC emission factors due to differences in test methods and the availability of test data for each pollutant.

#### ATTACHMENT N: INTERNAL COMBUSTION ENGINE DATA SHEETS

ENGINE SPECIFICATION SHEETS
AP-42 AND EPA EMISSION FACTORS

#### ATTACHMENT N - INTERNAL COMBUSTION ENGINE DATA SHEET

Complete this data sheet for each internal combustion engine at the facility. Include manufacturer performance data sheet(s) or any other supporting document if applicable. Use extra pages if necessary. *Generator(s) and microturbine generator(s) shall also use this form.* 

Emission Unit I	D#1	EU-I	ENG1	EU-I	ENG2	EU-l	ENG3	
Engine Manufac	cturer/Model	Caterpillar	G3306 NA	Caterpillar	G3306 NA	Bucks GM Vortec 5.7L		
Manufacturers I	Rated bhp/rpm	145-hp/1	,800-rpm	145-hp/1	,800-rpm	196.0-hp/	/2,200-rpm	
Source Status <sup>2</sup>		Е	S	F	ES	I	ES	
Date Installed/ Modified/Remo	ved/Relocated <sup>3</sup>	20	16	Tì	BD	T	BD	
Engine Manufac /Reconstruction		2/13/	/2015	T	BD	T	BD	
Check all applicable Federal Rules for the engine (include EPA Certificate of Conformity if applicable) <sup>5</sup>			ed? ubpart IIII ed? ubpart ZZZZ	□ NESHAP 2	ed? Subpart IIII ed? Subpart ZZZZ			
Engine Type <sup>6</sup>		4S	RB	4S	RB	48	SRB	
APCD Type <sup>7</sup>		NS	CR	NS	SCR	NSCR		
Fuel Type <sup>8</sup>	Fuel Type <sup>8</sup>		PQ		PQ	PQ		
$H_2S$ (gr/100 scf	$H_2S$ (gr/100 scf)		Negligible		igible	Negligible		
Operating bhp/r	Operating bhp/rpm		145-hp/1,800-rpm		,800-rpm	196.0-hp/2,200-rpm		
BSFC (BTU/bhj	BSFC (BTU/bhp-hr)		8,625		625	16,185		
Hourly Fuel Th	roughput	1,382 ft <sup>3</sup> /hr gal/hr		1,382 ft <sup>3</sup> / ga	hr l/hr	1,949 ft³/hr gal/hr		
Annual Fuel Th (Must use 8,760 emergency gene	hrs/yr unless	12.11 MMft³/yr gal/yr		12.11 MMft³/yr gal/yr		17.07 MMft³/yr gal/yr		
Fuel Usage or H Operation Meter		Yes □	No ⊠	Yes □	No ⊠	Yes □ No ⊠		
Calculation Methodology <sup>9</sup>	Pollutant <sup>10</sup>	Hourly PTE (lb/hr) <sup>11</sup>	Annual PTE (tons/year)	Hourly PTE (lb/hr) 11	Annual PTE (tons/year)	Hourly PTE (lb/hr) 11	Annual PTE (tons/year)	
MD	NOx	0.32	1.40	0.32	1.40	0.43	1.88	
MD	СО	0.64	2.80	0.64	2.80	0.86	3.77	
MD	VOC	0.07	0.31	0.07	0.31	0.30	1.31	
AP	SO <sub>2</sub>	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	
AP	PM <sub>10</sub>	0.01	0.04	0.01	0.04	0.02	0.07	
MD	Formaldehyde	0.02	0.09	0.02	0.09	0.04	0.16	
AP	Total HAPs	0.03	0.15	0.03	0.15	0.06	0.24	
MD and EPA	GHG (CO <sub>2</sub> e)	155.19	679.73	155.19	679.73	206.62	905.00	

<sup>1</sup> Enter the appropriate Source Identification Number for each natural gas-fueled reciprocating internal combustion engine/generator engine located at the well site. Multiple engines should be designated CE-1, CE-2, CE-3 etc. Generator engines should be designated GE-1, GE-3, etc. Microturbine generator engines should be designated MT-1, MT-2, MT-3 etc. If more than three (3) engines exist, please use additional sheets.

2 Enter the Source Status using the following codes:

 NS
 Construction of New Source (installation)
 ES
 Existing Source

 MS
 Modification of Existing Source
 RS
 Relocated Source

REM Removal of Source

- 3 Enter the date (or anticipated date) of the engine's installation (construction of source), modification, relocation or removal.
- 4 Enter the date that the engine was manufactured, modified or reconstructed.
- Is the engine a certified stationary spark ignition internal combustion engine according to 40CFR60 Subpart IIII/JJJJ? If so, the engine and control device must be operated and maintained in accordance with the manufacturer's emission-related written instructions. You must keep records of conducted maintenance to demonstrate compliance, but no performance testing is required. If the certified engine is not operated and maintained in accordance with the manufacturer's emission-related written instructions, the engine will be considered a non-certified engine and you must demonstrate compliance as appropriate.

#### Provide a manufacturer's data sheet for all engines being registered.

6 Enter the Engine Type designation(s) using the following codes:

2SLB Two Stroke Lean Burn 4SRB Four Stroke Rich Burn

4SLB Four Stroke Lean Burn

7 Enter the Air Pollution Control Device (APCD) type designation(s) using the following codes:

A/F Air/Fuel Ratio IR Ignition Retard

HEISHigh Energy Ignition SystemSIPCScrew-in Precombustion ChambersPSCPrestratified ChargeLECLow Emission Combustion

NSCR Rich Burn & Non-Selective Catalytic Reduction

OxCat Oxidation Catalyst

SCR Lean Burn & Selective Catalytic Reduction

SCR Lean Burn & Selective Catalytic Reduction

8 Enter the Fuel Type using the following codes:

PQ Pipeline Quality Natural Gas RG Raw Natural Gas /Production Gas D Diesel

9 Enter the Potential Emissions Data Reference designation using the following codes. Attach all reference data used.

MD Manufacturer's Data AP AP-42

GR GRI-HAPCalc<sup>TM</sup> OT Other (please list)

- Enter each engine's Potential to Emit (PTE) for the listed regulated pollutants in pounds per hour and tons per year. PTE shall be calculated at manufacturer's rated brake horsepower and may reflect reduction efficiencies of listed Air Pollution Control Devices. Emergency generator engines may use 500 hours of operation when calculating PTE. PTE data from this data sheet shall be incorporated in the *Emissions Summary Sheet*.
- 11 PTE for engines shall be calculated from manufacturer's data unless unavailable.

# Engine Air Pollution Control Device

(Emission Unit ID# APC-NSCR-ENG-	1, ENG-2, use extra pages as necessary)							
Air Pollution Control Device Manufacturer's Data Sheet included?  Yes ⊠ No □								
⊠ NSCR □ SCR	☐ Oxidation Catalyst							
Provide details of process control used for proper mixing/con	trol of reducing agent with gas stream:							
Manufacturer: N/A	Model #: N/A							
Design Operating Temperature: 1,101 °F	Design gas volume: 678 scfm							
Service life of catalyst: Provide manufacturer data? \( \text{ Yes} \) \( \text{ No} \)								
Volume of gas handled: acfm at °F	Operating temperature range for NSCR/Ox Cat: From 600 °F to 1,250 °F							
Reducing agent used, if any:	Ammonia slip (ppm):							
Pressure drop against catalyst bed (delta P): inches of	H <sub>2</sub> O							
Provide description of warning/alarm system that protects un	t when operation is not meeting design conditions:							
Is temperature and pressure drop of catalyst required to be mo ☐ Yes ☒ No	onitored per 40CFR63 Subpart ZZZZ?							
How often is catalyst recommended or required to be replaced	l (hours of operation)?							
How often is performance test required?  Initial Annual Every 8,760 hours of operation Field Testing Required No performance test required. If so, why (please list any NSPS/GACT	maintenance required and the applicable sections in							

# G3306 NA

SET POINT TIMING:

#### GAS ENGINE SITE SPECIFIC TECHNICAL DATA



ENGINE SPEED (rpm): COMPRESSION RATIO: JACKET WATER OUTLET (°F): COOLING SYSTEM: **IGNITION SYSTEM: EXHAUST MANIFOLD:** COMBUSTION: EXHAUST 02 EMISSION LEVEL %: 1800 10,5:1 210 JW+OC MAG WC

0.5

FUEL SYSTEM:

LPG IMPCO WITH CUSTOMER SUPPLIED AIR FUEL RATIO CONTROL

SITE CONDITIONS:

FUEL: FUEL PRESSURE RANGE(psig): FUEL METHANE NUMBER: FUEL LHV (Btu/scf):

Nat Gas 1.5-10.0 84.8 905

Catalyst ALTITUDE(ft): 30.0

500 77

MAXIMUM INLET AIR TEMPERATURE(°F):

145 hbp@1800r

	NA	MEPLATE RA		145 bhp@1800rpn		
			MAXIMUM RATING	SITE RATING AT MAXIMUM INLET		
RATING	NOTES	LOAD	100%	100%	75%	50%
ENGINE POWER	(1)	bhp	145	145	109	72
INLET AIR TEMPERATURE		°F	77	77	77	77
ENGINE DATA						
FUEL CONSUMPTION (LHV)	(2)	Btu/bhp-hr	7775	7775	8318	9509
FUEL CONSUMPTION (HHV)	(2)	Btu/bhp-hr	8625	8625	9227	10548
AIR FLOW	(3)(4)	lb/hr	922	922	739	556
AIR FLOW WET (77°F, 14.7 psia)	(3)(4)	scfm	208	208	167	125
INLET MANIFOLD PRESSURE	(5)	in Hg(abs)	26.2	26.2	21.8	17.6
EXHAUST STACK TEMPERATURE	(6)	°F	1101	1101	1067	1037
EXHAUST GAS FLOW (@ stack temp, 14.5 psia)	(7)(4)	ft3/min	678	678	532	393
EXHAUST GAS MASS FLOW	(7)(4)	lb/hr	978	978	784	590
EMISSIONS DATA	W Is					
NOx (as NO2)	(8)	g/bhp-hr	13.47	13.47	12.15	9.76
co	(8)	g/bhp-hr	13.47	13.47	11.44	9.56
THC (mol. wt., of 15.84)	(8)	g/bhp-hr	2.20	2.20	2.49	3.22
NMHC (mol. wt. of 15.84)	(8)	g/bhp-hr	0.33	0.33	0.37	0.48
NMNEHC (VOCs) (mol. wt. of 15.84)	(8)(9)	g/bhp-hr	0.22	0.22	0.25	0.32
HCHO (Formaldehyde)	(8)	g/bhp-hr	0.27	0.27	0.31	0.33
CO2	(8)	g/bhp-hr	485	485	525	601
EXHAUST OXYGEN	(10)	% DRY	0.5	0.5	0.5	0.5
HEAT REJECTION						
HEAT REJ. TO JACKET WATER (JW)	(11)	Btu/min	6049	6049	5237	4455
HEAT REJ. TO ATMOSPHERE	(11)	Btu/min	751	751	602	459
HEAT REJ. TO LUBE OIL (OC)	(11)	Btu/min	990	990	857	729
HEAT EXCHANGER SIZING CRITERIA						
TOTAL MOVET MATER OFFICE AND CONTENTA	(40)	D. ( :	70.10	1		

CONDITIONS AND DEFINITIONS
Engine rating obtained and presented in accordance with ISO 3046/1, adjusted for fuel, site altitude and site inlet air temperature. 100% rating at maximum inlet air temperature is the maximum engine capability for the specified fuel at site altitude and maximum site inlet air temperature. Max. rating is the maximum capability for the specified fuel at site altitude and reduced inlet air temperature. Lowest load point is the lowest continuous duty operating load allowed. No overload permitted at rating shown.

(12)

Btu/min

7842

For notes information consult page three.

TOTAL JACKET WATER CIRCUIT (JW+OC)

PREPARED BY:

Data generated by Gas Engine Rating Pro Version 3.04.00 Ref. Data Set DM5053-07-000, Printed 31Jan2011





**Prepared For:** 

Jason Stinson
MIDCON COMPRESSION, LP

# MANUFACTURED ON OR AFTER 1/1/2011

#### INFORMATION PROVIDED BY CATERPILLAR

G3306 NA Engine: 145 Horsepower: 1800 RPM: Compression Ratio: 10.5:1 678 CFM **Exhaust Flow Rate:** 1101 °F Exhaust Temperature: Reference: DM5053-07 Natural Gas Fuel: Annual Operating Hours: 8760

#### **Uncontrolled Emissions**

 NOx:
 13.47 g/bhp-hr

 CO:
 13.47 g/bhp-hr

 THC:
 2.20 g/bhp-hr

 NMHC:
 0.33 g/bhp-hr

 NMNEHC:
 0.22 g/bhp-hr

 HCHO:
 0.27 g/bhp-hr

 Oxygen:
 0.50 %

#### POST CATALYST EMISSIONS

NOx: <1.0 g/bhp-hr CO: <2.0 g/bhp-hr VOC: <0.7 g/bhp-hr

#### **CONTROL EQUIPMENT**

#### **Catalytic Converter**

Model: EAH-1200T-0404F-21CEE
Catalyst Type: NSCR, Precious group metals
Manufacturer: EMIT Technologies, Inc.

Element Size: Round 12 x 3.5

Catalyst Elements: 1

Housing Type: 2 Element Capacity
Catalyst Installation: Accessible Housing
Construction: 10 gauge Carbon Steel

Sample Ports: 6 (0.5" NPT)

Inlet Connections: 4" Flat Face Flange
Outlet Connections: 4" Flat Face Flange
Configuration: End In / End Out

Silencer: Integrated
Silencer Grade: Hospital
Insertion Loss: 35-40 dBA

#### Air Fuel Ratio Controller

Model: ENG-S-075-T

Manufacturer: EMIT Technologies, Inc.

Description: EDGE NG Air Fuel Ratio Controller

4-Wire Narrowband O2 Sensor

Digital Power Valve O2 Sensor Weldment

Wiring Harness

(2) 25' Type K Thermocouple

Digital Power Valve Size: 0.75" NPT





GM Powertrain takes its expertise in designing outstanding Vortec truck and SUV engines and leverages it to make sophisticated yet extremely durable industrial engines.

#### **Applications**

#### Industrial, Agriculture **Construction & Oilfield**

- Pumps Irrigation, Industrial, Hydraulic, Sludge and Trash
- Compressors Natural Gas and Air
- Generators Prime Power, Standby and Co-Gen
- Industrial Drives -Forklifts, Manlifts, Street Sweepers, Wood Chippers, Chillers and Fans
- Oil and Gas Production -Gas Compressors, Pump Jacks, Vapor Recovery
- Wind Machines
- Numerous Re-Power & **Custom Applications**

#### **Available Factory Installed Options**

- · Natural Gas and LPG **Fuel Systems**
- · Ignition Systems
- · Belt and Pulley Accessory Drives
- · Starters and Alternators
- · Exhaust Headers and Manifolds
- Mufflers
- SAE 3 Flywheel Housing and **Direct Drives**
- · PTOs: Side Load and In-Line
- Instrument Panel w/Gauges and Safety Shutdowns
- · Governors: Electronic and Mechanical
- · Engine Mounting Frames and **Enclosures**
- Three Way Catalyst

# Vortec<sup>™</sup> 5.7L 8 Cylinder - 350 Cubic Inches



## **Features & Benefits**

- Three way catalyst and closed loop fuel system for EPA/CARB emission certified engines
- Designed for propane and natural gas fuel
- Intake manifold is standard on the engine
- Hydraulic roller lifter camshaft is optimized for maximum performance
- Composite front cover for noise reduction
- Nodular iron crankshaft for increased strength and durability
- High Energy Ignition (HEI) distributor and coil are standard

- Induction-hardened inlet valve seats and sintered powder metal exhaust valve seat inserts for maximum durability
- World-class engine sealing system uses composite cylinder head gasket with steel cores, a one piece main crankshaft seal, a one piece oil pan seal and molded rocker cover seals
- Positive inlet valve stem seals to control oil consumption
- Common GM Powertrain industrial engine rear face for easy housing installation



#### Main Office:

20 N. McCormick Oklahoma City, OK 73127 405-601-1000

515 North I-27 Lubbock, TX 79403 806-762-0455

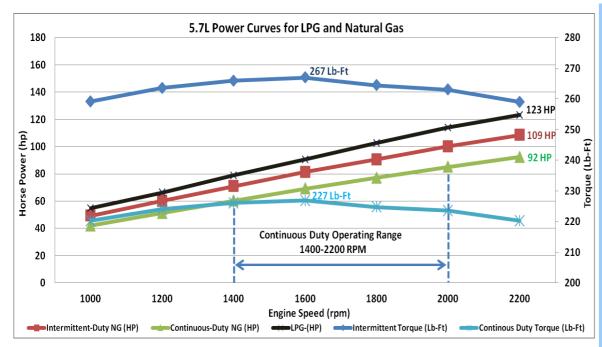
4452 Canyon Dr. Amarillo, TX 79109 806-355-8228

56
Buck's Engines combines over 50 years of engine application experience with General Motors' expertise in designing outstanding Vortec engines and utilizes this partnership to manufacture extremely durable industrial engines.





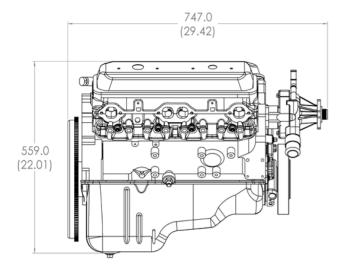
# Vortec<sup>™</sup> 5.7L 8 Cylinder – 350 Cubic Inches

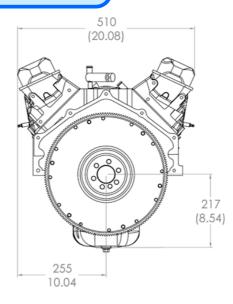


Power and torque values provided by Buck's Engines per SAE1349. Actual power levels may vary depending on fuel selection and quality, calibration, application, altitude and ambient air temperatures.

## **CONTINUOUS BRAKE HORSEPOWER**

GEARHEAD 1x1 6x5 5x4 ENGINE RPM 1760 2112 2200 BHP 73 87 92





Information may vary by model and application. All specifications, options and product availability based upon the latest information available at time of publication. To ensure our customers have access to the highest quality products available we reserve the right to make product improvements and changes anytime without prior notice and Vortec T57 trademarks are property of General Motors Corporation. ©2010 10/10

# Specifications and Materials

- Type: 90° 5.7L V8
- Displacement: 350 cld (5736 cc)
- Compression Ratio: 9.4:1
- Valve Configuration: Overhead/Pushrod Actuated
- Valve Lifters: Overhead/Pushrod Actuated
- Bore x Stroke: 4.00 x 3.48 in (101.60 x 88.39 mm)
- Main Bearing Caps: 2-Bolt
- Balance Method: External
- Intake Manifold: Four Barrel
- Firing Order: 1-8-4-3-6-5-7-2
- Oil Pan Capacity:
   5 qt without oil filter
- Fuel Type: Propane or Natural Gas
- Engine Rotation: Clockwise (from the front)
- Paint Protection: Component Painted
- Shipping Weight: 434 lb (197 kg)
- Block: Cast Iron
- Cylinder Head: Cast Iron
- Intake Manifold: Cast Aluminum
- Final Assembly: Oklahoma City, OK USA

Manufactured with US, North American and Global Sourced Content

#### Powered by GM



#### Vortec 5.7L V-8

#### **Industrial**



- High-flow cylinder head with straighter intake ports and a higher compression ratio delivers impressive horsepower
- Valvetrain features advanced design silent timing chain for added durability and positive inlet valve stem seals for reduced oil consumption
- Roller valve lifters for reduced friction and improved performance
- Composite front timing cover for noise reduction and corrosion protection
- Water pump features include:
- Revised housing a reservoir cavity replaces the weep hole
- Upgraded shaft, bearing, and seal for extended life
- Shrouded impeller for improved efficiency
- Cylinder head gaskets have stainless steel core for corrosion resistance



#### **Available Options**

- A Marine Engine Fuel Injection (MEFI) electronic control module and related parts are available in kit form. The controller uses state-of-the-art technology to optimize fuel spark requirements.
- Integral Air Fuel Module (IAFM) inlet manifold (gasoline only).
- EST and HEI distributors and coils are available in kit form.

## **Powered by GM**



#### Vortec 5.7L V-8

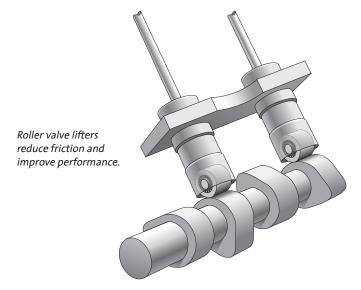
#### **Feature Focus**

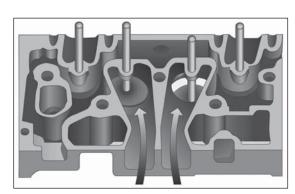


All GM industrial engines are Vortec engines. Vortec means uncompromised power — outstanding power with no sacrifice in fuel efficiency or durability and very little required maintenance.

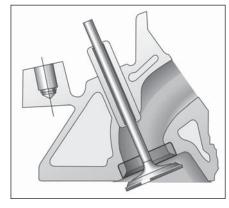
GM Powertrain takes its expertise in designing outstanding Vortec truck and SUV engines and leverages it to make sophisticated yet extremely durable industrial engines. In addition, the well-recognized Vortec brand name by itself has become a valuable selling tool for OEMs.







A high-flow cylinder head with straighter intake ports and a higher compression ratio delivers significantly better combustion for all fuels.



The exhaust valve seat inserts in the cylinder head provide superb durability.

### Powered by GM



#### Vortec 5.7L V-8

## **Specifications**



#### Vortec 5.7L V-8 Specification Focus

Type: 5.7L V-8 Gen 1e Small Block
Displacement: 350 cid (5736 cc)
Engine Orientation: Longitudinal

Compression Ratio: 9.4:1

Valve Configuration: Overhead Valves

(2 valves per cylinder)

Assembly Site: Toluca, Mexico

Valve Lifters: Hydraulic Roller

Firing Order: 1-8-4-3-6-5-7-2

Bore x Stroke: 101.60 x 88.39 mm

Bore Center: 111.76 mm Bore Area: 648.59 cm<sup>2</sup> Fuel System: None Fuel Type: LP & CNG

Horsepower:

216 hp (161 kW) @ 4000 rpm (Propane) 196 hp (146 kW) @ 4000 rpm (Natural Gas)

Torque

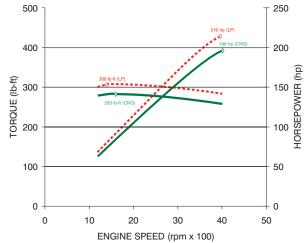
308 lb-ft (418 Nm) @ 1400 rpm (Propane) 283 lb-ft (384 Nm) @ 1600 rpm (Natural Gas)

Actual power levels may vary depending on OEM calibration and application.

Fuel Shutoff: N/A

Shipping Weight: 432 lb (196 kg)

**Emissions Controls:** Positive Crankcase Ventilation



Actual power levels may vary depending on OEM calibration and application.

**Materials:** 

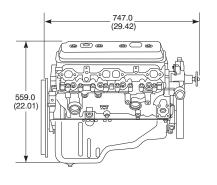
Block: Cast Iron GM232-M Cylinder Head: Cast Iron Intake Manifold: None Exhaust Manifold: None

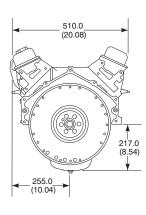
Main Bearing Caps: Cast Iron GM232-M

Crankshaft: Nodular Iron
Camshaft: 5150 Steel Billet

Connecting Rods: Forged - SAE 1141

Information may vary with application. All specifications listed are based on the latest product information available at the time of publication. The right is reserved to make changes at any time without notice.







GM Powertrain

www.gmpowertrain.com

# 5.7L Bucks Engine-Out Emissions on Pipeline Natural Gas

Engine	5.7L Bucks	5.7L Bucks	5.7L Bucks		
Test Description	Steady-State Raw Engine-Out Emissions	Steady-State Raw Engine-Out Emissions	Steady-State Raw Engine-Out Emissions		
Date	1/4/08	1/4/08	1/4/08		
Flywheel	Bucks Cert Cell 5	Bucks Cert Cell 6	Bucks Cert Cell 7		
Catalyst	Model TG192W-3, SN NX-0316	Model TG192W-3, SN NX-0316	Model TG192W-3, SN NX-0316		
Calibration	MI07SEQ064_GM574X_B_EMS_D_015.cal	MI07SEQ064_GM574X_B_EMS_D_015.cal	MI07SEQ064_GM574X_B_EMS_D_015.cal		
Speed	2400	2400	2400		
TQ (Nm)	337	337	337		
UEGO PHI	0.990	1.000	1.010		
Fuel	Pipeline NG	Pipeline NG	Pipeline NG		
THC ppm	597	586	616		
NMHC ppm (est)	35.8	35.2	36.9		
NOx ppm	2007	2001	2056		
NMHC + NOx ppm	2043	2036	2093		
CO %	0.927	1.120	1.287		
CO2 %	10.36	10.27	10.27		
BTE	31.2	31.2	31.2		
NOTES	PHI using UEGO Sensor	PHI using UEGO Sensor	PHI using UEGO Sensor		

Table 3.2-3. UNCONTROLLED EMISSION FACTORS FOR 4-STROKE RICH-BURN  $\operatorname{ENGINES}^{\operatorname{a}}$ (SCC 2-02-002-53)

Pollutant	Emission Factor (lb/MMBtu) <sup>b</sup> (fuel input)	Emission Factor Rating
Criteria Pollutants and Greenhous	se Gases	
NO <sub>x</sub> c 90 - 105% Load	2.21 E+00	A
NO <sub>x</sub> c <90% Load	2.27 E+00	С
CO <sup>c</sup> 90 - 105% Load	3.72 E+00	A
CO <sup>c</sup> <90% Load	3.51 E+00	С
$CO_2^{d}$	1.10 E+02	A
SO <sub>2</sub> <sup>e</sup>	5.88 E-04	A
$TOC^\mathrm{f}$	3.58 E-01	С
Methane <sup>g</sup>	2.30 E-01	С
VOCh	2.96 E-02	С
PM10 (filterable) <sup>i,j</sup>	9.50 E-03	E
PM2.5 (filterable) <sup>j</sup>	9.50 E-03	E
PM Condensable <sup>k</sup>	9.91 E-03	E
Trace Organic Compounds		
1,1,2,2-Tetrachloroethane <sup>1</sup>	2.53 E-05	C
1,1,2-Trichloroethane <sup>1</sup>	<1.53 E-05	E
1,1-Dichloroethane	<1.13 E-05	E
1,2-Dichloroethane	<1.13 E-05	E
1,2-Dichloropropane	<1.30 E-05	E
1,3-Butadiene <sup>l</sup>	6.63 E-04	D
1,3-Dichloropropene <sup>1</sup>	<1.27 E-05	Е
Acetaldehyde <sup>l,m</sup>	2.79 E-03	С
Acrolein <sup>1,m</sup>	2.63 E-03	С
Benzene	1.58 E-03	В
Butyr/isobutyraldehyde	4.86 E-05	D
Carbon Tetrachloride <sup>1</sup>	<1.77 E-05	E

Table 3.2-3. UNCONTROLLED EMISSION FACTORS FOR 4-STROKE RICH-BURN ENGINES (Concluded)

Pollutant	Emission Factor (lb/MMBtu) <sup>b</sup> (fuel input)	Emission Factor Rating
Chlorobenzene	<1.29 E-05	Е
Chloroform	<1.37 E-05	Е
Ethane <sup>n</sup>	7.04 E-02	С
Ethylbenzene <sup>1</sup>	<2.48 E-05	Е
Ethylene Dibromide <sup>l</sup>	<2.13 E-05	Е
Formaldehyde <sup>l,m</sup>	2.05 E-02	A
Methanol <sup>1</sup>	3.06 E-03	D
Methylene Chloride <sup>l</sup>	4.12 E-05	С
Naphthalene	<9.71 E-05	Е
PAH <sup>l</sup>	1.41 E-04	D
Styrene <sup>1</sup>	<1.19 E-05	Е
Toluene	5.58 E-04	A
Vinyl Chloride <sup>l</sup>	<7.18 E-06	Е
Xylene <sup>l</sup>	1.95 E-04	A

Reference 7. Factors represent uncontrolled levels. For  $NO_x$ , CO, and PM-10, "uncontrolled" means no combustion or add-on controls; however, the factor may include turbocharged units. For all other pollutants, "uncontrolled" means no oxidation control; the data set may include units with control techniques used for NOx control, such as PCC and SCR for lean burn engines, and PSC for rich burn engines. Factors are based on large population of engines. Factors are for engines at all loads, except as indicated. SCC = Source Classification Code. TOC = Total Organic Compounds. PM10 = Particulate Matter  $\leq$  10 microns ( $\mu$ m) aerodynamic diameter. A "<" sign in front of a factor means that the corresponding emission factor is based on one-half of the method detection limit.

b Emission factors were calculated in units of (lb/MMBtu) based on procedures in EPA Method 19. To convert from (lb/MMBtu) to (lb/10<sup>6</sup> scf), multiply by the heat content of the fuel. If the heat content is not available, use 1020 Btu/scf. To convert from (lb/MMBtu) to (lb/hp-hr) use the following equation:

lb/hp-hr = db/MMBtu, heat input, MMBtu/hr, d1/operating HP, 1/hp

<sup>&</sup>lt;sup>c</sup> Emission tests with unreported load conditions were not included in the data set. <sup>d</sup> Based on 99.5% conversion of the fuel carbon to  $CO_2$ .  $CO_2$  [lb/MMBtu] = (3.67)(%CON)(C)(D)(1/h), where %CON = percent conversion of fuel carbon to  $CO_2$ ,

C = carbon content of fuel by weight (0.75), D = density of fuel,  $4.1 \text{ E}+04 \text{ lb}/10^6 \text{ scf}$ , and h = heating value of natural gas (assume 1020 Btu/scf at  $60^{\circ}\text{F}$ ).

Based on 100% conversion of fuel sulfur to SO<sub>2</sub>. Assumes sulfur content in natural gas of 2,000 gr/10<sup>6</sup> scf.

Emission factor for TOC is based on measured emission levels from 6 source tests.

- <sup>g</sup> Emission factor for methane is determined by subtracting the VOC and ethane emission factors from the TOC emission factor.
- h VOC emission factor is based on the sum of the emission factors for all speciated organic compounds. Methane and ethane emissions were not measured for this engine category.

No data were available for uncontrolled engines. PM10 emissions are for engines equipped with a PCC.

- <sup>j</sup> Considered  $\leq 1 \ \mu \text{m}$  in aerodynamic diameter. Therefore, for filterable PM emissions, PM10(filterable) = PM2.5(filterable).
- <sup>k</sup> No data were available for condensable emissions. The presented emission factor reflects emissions from 4SLB engines.
- <sup>1</sup> Hazardous Air Pollutant as defined by Section 112(b) of the Clean Air Act.
- <sup>m</sup> For rich-burn engines, no interference is suspected in quantifying aldehyde emissions. The presented emission factors are based on FTIR and CARB 430 emissions data measurements.
- <sup>n</sup> Ethane emission factor is determined by subtracting the VOC emission factor from the NMHC emission factor.

## ATTACHMENT O: TANKER TRUCK LOADING DATA SHEET

#### ATTACHMENT O – TANKER TRUCK/RAIL CAR LOADING DATA SHEET

Complete this data sheet for each new or modified bulk liquid transfer area or loading rack at the facility. This is to be used for bulk liquid transfer operations to tanker trucks/rail cars. Use extra pages if necessary.

#### Truck/Rail Car Loadout Collection Efficiencies

The following applicable capture efficiencies of a truck/rail car loadout are allowed:

- For tanker trucks/rail cars passing the MACT level annual leak test 99.2%
- For tanker trucks/rail cars passing the NSPS level annual leak test 98.7%
- For tanker trucks/rail cars not passing one of the annual leak tests listed above 70%

Compliance with this requirement shall be demonstrated by keeping records of the applicable MACT or NSPS Annual Leak Test certification for *every* truck and railcar loaded/unloaded. This requirement can be satisfied if the trucking/rail car company provided certification that its entire fleet was compliant. This certification must be submitted in writing to the Director of the DAQ. These additional requirements must be noted in the Registration Application.

Emission Unit ID#: EU-L	Emission Point ID#: EP-LOAD- COND/APC-COMB			Year Installed/Modified: 2016				
Emission Unit Description: Condensate Truck Loading Emissions								
			Loading A	Area Data				
Number of Pumps: 1		Numbe	r of Liquids	Loaded: 1		Max numb at one (1)		ucks/rail cars loading
Are tanker trucks/rail cars pressure tested for leaks at this or any other location?   Yes   No   Not Required If Yes, Please describe:								☐ Not Required
Provide description of clo	osed vent syster	n and an	y bypasses.	Vapors are co	ollected	and routed t	o a vapo	or combustor.
Are any of the following truck/rail car loadout systems utilized?  Closed System to tanker truck/rail car passing a MACT level annual leak test?  Closed System to tanker truck/rail car passing a NSPS level annual leak test?  Closed System to tanker truck/rail car not passing an annual leak test and has vapor return?								
Projected Maximum Operating Schedule (for rack or transfer point as a whole)								
Time	Jan – Ma	r	Apr -	- Jun	Jul – Sept			Oct - Dec
Hours/day	24		2	4	24			24
Days/week	5		4	5	5			5
	Bull	k Liquid	Data (use e	xtra pages a	s necess:	ary)		
Liquid Name	Condens	ate						
Max. Daily Throughput (1000 gal/day)	54.6							
Max. Annual Throughput (1000 gal/yr)	19,929							
Loading Method <sup>1</sup>	SUB							
Max. Fill Rate (gal/min)	125							
Average Fill Time (min/loading)	Approx.	60						
Max. Bulk Liquid Temperature (°F)	50.33	50.33						
True Vapor Pressure <sup>2</sup>	7.925							
Cargo Vessel Condition <sup>3</sup>	U							
Control Equipment or Method <sup>4</sup>	O = Vapo Combust							

Max. Collection Efficiency (%)		70%								
Max. Control Efficiency (%)			98%							
Max.VOC Emission	Loading (lb/hr)		13.07 17.37							
Rate	Annual (ton/yr)									
Max.HAP Emission	Loading (lb/hr)		1.06							
Rate	Annual (ton/yr)		1.41							
Estimation Me	ethod <sup>5</sup>		O = Pron simulatio		ess					
				l <b>-</b>				I		
Emission Unit	ID#: EU-	LOAD	-PW		on Point ID# PC-COMB	t: EP-LOAD-		Year Inst	alled/M	odified: 2016
Emission Unit	Descripti	on: Pr	roduced W	ater Loa	ding Emissio	ons				
					Loading	Area Data				
Number of Pu	mps: 1			Numbe	er of Liquids	Loaded: 1		Max num at one (1)		rucks/rail cars loading
Are tanker tru If Yes, Please		rs pres	ssure teste	d for leal	ks at this or	any other loc	ation?	□ Yes	⊠ No	☐ Not Required
Provide descri	ption of c	losed v	vent system	n and an	y bypasses.	Vapors are co	ollected	and routed	to a vap	oor combustor.
Are any of the  ☐ Closed Sys ☐ Closed Sys ☐ Closed Sys	stem to tar	iker tru iker tru	uck/rail ca uck/rail ca	r passing r passing	g a MACT le g a NSPS lev	vel annual le el annual lea	k test?	apor return	?	
	Proj	jected	Maximun	ı Operat	ing Schedul	e (for rack o	r transf	er point as	a whol	e)
Time			Jan – Ma	r	Apr	- Jun	J	ul – Sept		Oct - Dec
Hours/day			24		2	24	24			24
Days/week			5			5		5		5
					Data (use e	xtra pages a	s necess:	ary)		
Liquid Name			Produced	l Water						
Max. Daily The (1000 gal/day)	)		42							
Max. Annual (1000 gal/yr)		ıt	15,330							
Loading Meth			SUB							
Max. Fill Rate		1	125							
Average Fill 7 (min/loading)			Approx.	60						
Max. Bulk Lic Temperature (	°F)		50.33							
True Vapor Pr			0.2427							
Cargo Vessel Condition <sup>3</sup> U										
Control Equip Method <sup>4</sup>	quipment or O = Vapor Return/ Combustion Controls									
Max. Collection Efficiency (%) 70%										
Max. Control Efficiency (%) 98%		98%								
Max.VOC Emission	Loading (lb/hr)		0.16							
Rate	Annual (ton/yr)		0.16							
	Loading (lb/hr)		0.01							

Max.HAP Emission Rate	Annual (ton/yr)	0.01	
Estimation Method <sup>5</sup>		O = Promax process simulation	

1	BF	Bottom Fill	SP	SP Splash Fill			SUB	Submerged Fill
2	At maxin	num bulk liquid temperature						
3	В	Ballasted Vessel	C	Cleaned			U	Uncleaned (dedicated service)
	O	Other (describe)						
4	List as r	nany as apply (complete and	submit app	propriate A	Air Polluti	on Contr	ol Device	Sheets)
	CA	Carbon Adsorption		VB	Dedicate	ed Vapor	Balance (	closed system)
	ECD	Enclosed Combustion Device	ce	F	Flare			
	TO	Thermal Oxidization or Inc.	ineration					
5	EPA	EPA Emission Factor in AP	-42			MB	Materia	al Balance
	TM	Test Measurement based up	on test dat	ta submitta	a1	O	Other (d	escribe)

loading operation, resulting in high levels of vapor generation and loss. If the turbulence is great enough, liquid droplets will be entrained in the vented vapors.

A second method of loading is submerged loading. Two types are the submerged fill pipe method and the bottom loading method. In the submerged fill pipe method, the fill pipe extends almost to the bottom of the cargo tank. In the bottom loading method, a permanent fill pipe is attached to the cargo tank bottom. During most of submerged loading by both methods, the fill pipe opening is below the liquid surface level. Liquid turbulence is controlled significantly during submerged loading, resulting in much lower vapor generation than encountered during splash loading.

The recent loading history of a cargo carrier is just as important a factor in loading losses as the method of loading. If the carrier has carried a nonvolatile liquid such as fuel oil, or has just been cleaned, it will contain vapor-free air. If it has just carried gasoline and has not been vented, the air in the carrier tank will contain volatile organic vapors, which will be expelled during the loading operation along with newly generated vapors.

Cargo carriers are sometimes designated to transport only one product, and in such cases are practicing "dedicated service". Dedicated gasoline cargo tanks return to a loading terminal containing air fully or partially saturated with vapor from the previous load. Cargo tanks may also be "switch loaded" with various products, so that a nonvolatile product being loaded may expel the vapors remaining from a previous load of a volatile product such as gasoline. These circumstances vary with the type of cargo tank and with the ownership of the carrier, the petroleum liquids being transported, geographic location, and season of the year.

One control measure for vapors displaced during liquid loading is called "vapor balance service", in which the cargo tank retrieves the vapors displaced during product unloading at bulk plants or service stations and transports the vapors back to the loading terminal. Figure 5.2-5 shows a tank truck in vapor balance service filling a service station underground tank and taking on displaced gasoline vapors for return to the terminal. A cargo tank returning to a bulk terminal in vapor balance service normally is saturated with organic vapors, and the presence of these vapors at the start of submerged loading of the tanker truck results in greater loading losses than encountered during nonvapor balance, or "normal", service. Vapor balance service is usually not practiced with marine vessels, although some vessels practice emission control by means of vapor transfer within their own cargo tanks during ballasting operations, discussed below.

Emissions from loading petroleum liquid can be estimated (with a probable error of  $\pm 30$  percent)<sup>4</sup> using the following expression:

$$L_{L} = 12.46 \frac{SPM}{T} \tag{1}$$

where:

 $L_T$  = loading loss, pounds per 1000 gallons (lb/10<sup>3</sup> gal) of liquid loaded

S = a saturation factor (see Table 5.2-1)

P = true vapor pressure of liquid loaded, pounds per square inch absolute (psia) (see Figure 7.1-5, Figure 7.1-6, and Table 7.1-2)

M = molecular weight of vapors, pounds per pound-mole (lb/lb-mole) (see Table 7.1-2)

T = temperature of bulk liquid loaded,  $^{\circ}$ R ( $^{\circ}$ F + 460)

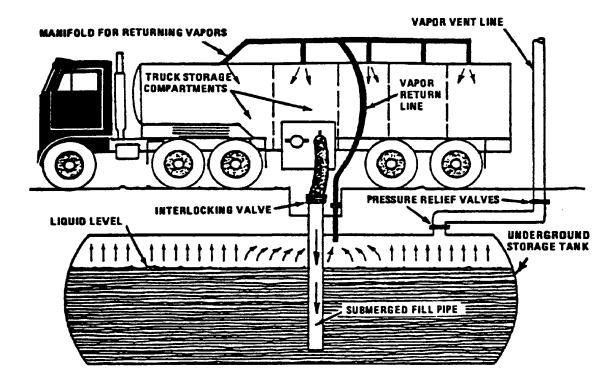


Figure 5.2-5. Tank truck unloading into a service station underground storage tank and practicing "vapor balance" form of emission control.

Table 5.2-1. SATURATION (S) FACTORS FOR CALCULATING PETROLEUM LIQUID LOADING LOSSES

Cargo Carrier	Mode Of Operation	S Factor
Tank trucks and rail tank cars	Submerged loading of a clean cargo tank	0.50
	Submerged loading: dedicated normal service	0.60
	Submerged loading: dedicated vapor balance service	1.00
	Splash loading of a clean cargo tank	1.45
	Splash loading: dedicated normal service	1.45
	Splash loading: dedicated vapor balance service	1.00
Marine vessels <sup>a</sup>	Submerged loading: ships	0.2
	Submerged loading: barges	0.5

<sup>&</sup>lt;sup>a</sup> For products other than gasoline and crude oil. For marine loading of gasoline, use factors from Table 5.2-2. For marine loading of crude oil, use Equations 2 and 3 and Table 5.2-3.

## ATTACHMENT Q: PNEUMATIC CONTROLLERS DATA SHEET

## ATTACHMENT Q - PNEUMATIC CONTROLLERS **DATA SHEET** Are there any continuous bleed natural gas driven pneumatic controllers at this facility that commenced construction, modification or reconstruction after August 23, 2011, and on or before September 18, 2015? Yes $\bowtie$ No Please list approximate number. Are there any continuous bleed natural gas driven pneumatic controllers at this facility that commenced construction, modification or reconstruction after **September 18, 2015?** ☐ Yes ☐ No Please list approximate number. Are there any continuous bleed natural gas driven pneumatic controllers at this facility with a bleed rate greater than 6 standard cubic feet per hour that are required based on functional needs, including but not limited to response time, safety and positive actuation that commenced construction, modification or reconstruction after August 23, 2011, and on or before September 18, 2015? ☐ Yes ☐ No Please list approximate number. Are there any continuous bleed natural gas driven pneumatic controllers at this facility with a bleed rate greater than 6 standard cubic feet per hour that are required based on functional needs, including but not limited to response time, safety and positive actuation that commenced construction, modification or

reconstruction after September 18, 2015?

No No

Yes

Please list approximate number.

## ATTACHMENT R: PNEUMATIC PUMP DATA SHEET

## ATTACHMENT R - PNEUMATIC PUMP **DATA SHEET**

Are there any natural gas-driven diaphragm pumps located at a well site that commenced construction, modification or reconstruction after September 18, 2015?

> No No Tes Yes

> > Please list.

Source ID#	Date	Pump Make/Model	Pump Size

# ATTACHMENT S: AIR POLLUTION CONTROL DEVICE/EMISSION REDUCTION DEVICES SHEETS

VAPOR COMBUSTION
AP-42 EMISSION FACTORS

## ATTACHMENT S – AIR POLLUTION CONTROL DEVICE / EMISSION REDUCTION DEVICE SHEETS

Complete the applicable air pollution control device sheets for each flare, vapor combustor, thermal oxidizer, condenser, adsorption system, vapor recovery unit, BTEX Eliminator, Reboiler with and without Glow Plug, etc. at the facility. Use extra pages if necessary.

Emissions calculations must be performed using the most conservative control device efficiency.

The following five (5) rows are only to be completed if	registering an alternative air pollution control device.
Emission Unit ID:	Make/Model:
Primary Control Device ID:	Make/Model:
Control Efficiency (%):	APCD/ERD Data Sheet Completed: ☐ Yes ☐ No
Secondary Control Device ID:	Make/Model:
Control Efficiency (%):	APCD/ERD Data Sheet Completed: ☐ Yes ☐ No

VAPOR COMBUSTION											
		(In	cluding En	closed Com	busto	rs)					
			Gener	al Information							
Control Device ID#:	APC-COI	МВ		Installation Date: 2016 ☐ New ☐ Modified ☐ Relocated							
Maximum Rated Tota 6,125 scfh 1	l Flow C 47,000 s			Maximum Desig Input (from mfg sheet) 15 MMBTU/hr		Design Heat Content 2,450 BTU/scf					
			Control I	Device Information	on						
<ul><li>☑ Enclosed Combus</li><li>☐ Thermal Oxidizer</li></ul>	tion Devi	ce		or Combustion Co levated Flare	ntrol?		Ground Flare				
Manufacturer: MRW Technologies Model: TBF-5.5-30-147000  Hours of operation per year? 8,760											
List the emission unit	s whose	emissions	are controlled by	y this vapor contro	ol device	(Emission	Point ID# )				
Emission Unit ID#	Emissio	on Source	Description	Emission Unit ID#	Emissic	on Source I	Description				
EU-TANKS-COND	Conden	sate Tanks	3	EU-LOAD- COND	Conden	sate Truck Loading					
EU-TANKS-PW	KS-PW Produced Water Tanks				Produce	duced Water Truck Loading					
If this vapor con	ıbustor c	ontrols em	issions from mo	re than six (6) em	ission un	its, please	attach additional pages.				
Assist Type (Flares of	nly)	F	lare Height	Tip D	iameter	Was the design per §60.18?					
Steam Pressure	☐ Air ⊠ Non		30 feet	5.5	feet	☐ Yes ☒ No Provide determination.					
			Waste	Gas Information							
Maximum Waste 0 204.17 (s		Rate	Heat Value of	Waste Gas Stream BTU/ft <sup>3</sup>	n 2,450	Exit Vel	elocity of the Emissions Stream (ft/s)				
Pi	ovide an	attachmen	t with the chara	cteristics of the w	vaste gas	stream to	be burned.				
			Pilot (	Gas Information							
Number of Pilot Li 1	ghts	Flam	w Rate to Pilot e per Pilot 0 scfh	Heat Inpo 45,250	ut per Pil BTU/hr	ot	Will automatic re-ignition be used?  ⊠ Yes □ No				
	pilot. If	the re-ign	ition attempt fai	ls, the pilot solen-			crol system will automatically natically close and a local				
Is pilot flame equipped presence of the flame			detect the No	If Yes, what typ  Ultraviolet		ermocoupl imera	e □ Infrared ⊠ Other: flame rod				
Describe all operating unavailable, please in		and mainte	nance procedure	s required by the	manufac	turer to ma	intain the warranty. (If				
Additional information Please attach copies of performance testing.				ngs, flame demor	nstration	per §60.18	or \$63.11(b) and				



# Tank Battery Combustor Specification Sheet MRW Technologies, Inc. Combustor Model Number: TBF-5.5-30-147000

Expected Destruction Removal Efficiency (DRE): 98% or Greater of

Non-Methane Hydrocarbons

Unit Size: 5.5-foot Diameter

30-Foot Overall Height

Design Heat Input: 15 MMBTU/HR

Design Flow Rates: 147,000 SCFD

Design Heat Content: 2450 BTU/SCF

Waste Gas Flame Arrestor: 2" Enardo

Pilot Type: MRW Electric Ignition

Pilot Operation (Continuous/Intermittent): Continuous

Pilot Fuel Consumption: 50 SCFH or Less

Pilot Monitoring Device: Flame Rod

Automatic Re-Ignition: Included

Remote Alarm Indication: Included

Description of Control Scheme:

The Combustor pilot is monitored via flame rod. If the pilot flame is lost, the control system will automatically attempt to relight the pilot. If the reignition attempt fails, the pilot solenoid valve will automatically close and a local & remote alarm signal will be generated to indicate loss of pilot flame.

Since flares do not lend themselves to conventional emission testing techniques, only a few attempts have been made to characterize flare emissions. Recent EPA tests using propylene as flare gas indicated that efficiencies of 98 percent can be achieved when burning an offgas with at least 11,200 kJ/m<sup>3</sup> (300 Btu/ft<sup>3</sup>). The tests conducted on steam-assisted flares at velocities as low as 39.6 meters per minute (m/min) (130 ft/min) to 1140 m/min (3750 ft/min), and on air-assisted flares at velocities of 180 m/min (617 ft/min) to 3960 m/min (13,087 ft/min) indicated that variations in incoming gas flow rates have no effect on the combustion efficiency. Flare gases with less than 16,770 kJ/m<sup>3</sup> (450 Btu/ft<sup>3</sup>) do not smoke.

Table 13.5-1 presents flare emission factors, and Table 13.5-2 presents emission composition data obtained from the EPA tests. I Crude propylene was used as flare gas during the tests. Methane was a major fraction of hydrocarbons in the flare emissions, and acetylene was the dominant intermediate hydrocarbon species. Many other reports on flares indicate that acetylene is always formed as a stable intermediate product. The acetylene formed in the combustion reactions may react further with hydrocarbon radicals to form polyacetylenes followed by polycyclic hydrocarbons.<sup>2</sup>

In flaring waste gases containing no nitrogen compounds, NO is formed either by the fixation of atmospheric nitrogen (N) with oxygen (O) or by the reaction between the hydrocarbon radicals present in the combustion products and atmospheric nitrogen, by way of the intermediate stages, HCN, CN, and OCN. Sulfur compounds contained in a flare gas stream are converted to  $SO_2$  when burned. The amount of  $SO_2$  emitted depends directly on the quantity of sulfur in the flared gases.

Table 13.5-1 (English Units). EMISSION FACTORS FOR FLARE OPERATIONS<sup>a</sup>

EMISSION FACTOR RATING: B

Component	Emission Factor (lb/10 <sup>6</sup> Btu)
Total hydrocarbons <sup>b</sup>	0.14
Carbon monoxide	0.37
Nitrogen oxides	0.068
Soot <sup>c</sup>	0 - 274

<sup>&</sup>lt;sup>a</sup> Reference 1. Based on tests using crude propylene containing 80% propylene and 20% propane.

<sup>&</sup>lt;sup>b</sup> Measured as methane equivalent.

<sup>&</sup>lt;sup>c</sup> Soot in concentration values: nonsmoking flares, 0 micrograms per liter (μg/L); lightly smoking flares, 40 μg/L; average smoking flares, 177 μg/L; and heavily smoking flares, 274 μg/L.

## ATTACHMENT T: EMISSIONS CALCULATIONS

### SWN Production Company, LLC Bonnette MSH Pad Summary of Criteria Air Pollutant Emissions

Farriament	Unit ID	Emission	N	Ox	CO		Total VOC1		SO <sub>2</sub>		PM Total	
Equipment	Unit ID	Point ID	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
145-hp Caterpillar G3306 NA Engine w/ Catalytic Converter	EU-ENG1	EP-ENG1	0.32	1.40	0.64	2.80	0.09	0.39	<0.01	<0.01	0.02	0.09
145-hp Caterpillar G3306 NA Engine w/ Catalytic Converter	EU-ENG2	EP-ENG2	0.32	1.40	0.64	2.80	0.09	0.39	<0.01	<0.01	0.02	0.09
146.2-kw Bucks GM Vortec 5.7L Engine	EU-ENG3	EP-ENG3	0.43	1.88	0.86	3.77	0.30	1.31	<0.01	<0.01	0.03	0.15
Eight (8) 1.0-mmBtu/hr GPU Burners	EU-GPU1 to EU- GPU8	EP-GPU1 - EP- GPU8	0.88	3.84	0.72	3.12	0.05	0.24	0.01	0.02	0.07	0.29
Two (2) 0.5-mmBtu/hr Heater Treaters	EU-HT1 to EU- HT2	EP-HT1 - EP- HT2	0.12	0.52	0.10	0.44	0.01	0.02	<0.01	<0.01	0.01	0.04
Four (4) 400-bbl Condensate Tanks Routed to Vapor Combustor - Revise	EU-TANKS- COND	APC-COMB	-	-	-	-	-	-	-	-	-	-
Four (4) 400-bbl Produced Water Tanks Routed to Vapor Combustor - Revise	EU-TANKS-PW	APC-COMB	-	-	-	-	-	-	-	-	-	-
Condensate Truck Loading w/ Vapor Return Routed to Combustor	EU-LOAD- COND	EP-LOAD- COND	-	-	-	-	3.97	17.37	-	-	-	-
Produced Water Truck Loading w/ Vapor Return Routed to Combustor	EU-LOAD-PW	EP-LOAD-PW	-	-	-	-	0.04	0.16	-	-	-	-
One (1) 15.0-mmBtu/hr Vapor Combustor - Tank/Loading Stream	APC-COMB	APC-COMB	2.07	9.07	4.13	18.09	5.18	22.69	-	-	0.04	0.18
Vapor Combustor Pilot	EU-PILOT	APC-COMB	0.01	0.04	<0.01	0.02	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Fugitive Emissions - Revise	EU-FUG	EP-FUG	-	-	-	-	1.43	6.27	-	-	-	-
Fugitive Haul Road Emissions	EU-HR	EP-HR	-	-	-	-	-	-	-	-	1.47	4.83
	Total Allowab	le Emissions =	4.15	18.16	7.09	31.04	11.15	48.84	0.01	0.04	1.66	5.66
Currer	nt Permit Allowab	le Emissions =	4.15	18.16	7.09	31.04	10.76	47.13	0.01	0.04	1.66	5.66
	Net Allowab	le Emissions =	0.00	0.00	0.00	0.00	0.39	1.71	0.00	0.00	0.00	0.00

<sup>&</sup>lt;sup>1</sup> Total VOC includes all constituents heavier than Propane (C3+), including hazardous air pollutants (HAP). Speciated HAP presented in following table. Also note that Caterpillar engine manufacturer data for VOC does not include formaldehyde; therefore, total VOC emissions presented here are different than VOC emissions as defined and calculated in the engine calculations.

### SWN Production Company, LLC Bonnette MSH Pad Summary of Hazardous Air Pollutants

						Estimated Em	nissions (lb/hr)				
Equipment	Unit ID	Acetalde- hyde	Acrolein	Benzene	Ethyl- benzene	Formalde- hyde	Methanol	n-Hexane	Toluene	Xylenes	Total HAP
145-hp Caterpillar G3306 NA Engine w/ Catalytic Converter	EU-ENG1	<0.01	<0.01	<0.01	<0.01	0.02	<0.01	-	<0.01	<0.01	0.03
145-hp Caterpillar G3306 NA Engine w/ Catalytic Converter	EU-ENG2	<0.01	<0.01	<0.01	<0.01	0.02	<0.01	1	<0.01	<0.01	0.03
146.2-kw Bucks GM Vortec 5.7L Engine	EU-ENG3	<0.01	<0.01	<0.01	<0.01	0.04	0.01	-	<0.01	<0.01	0.06
Eight (8) 1.0-mmBtu/hr GPU Burners	EU-GPU1 to EU- GPU8	-	-	<0.01	-	<0.01	-	0.02	<0.01	-	0.02
Two (2) 0.5-mmBtu/hr Heater Treaters	EU-HT1 to EU- HT2	-	-	<0.01	-	<0.01	-	<0.01	<0.01	-	<0.01
Four (4) 400-bbl Condensate Tanks Routed to Vapor Combustor - Revise	EU-TANKS- COND	-	-	<0.01	0.02	-	-	0.29	0.02	0.07	0.40
Four (4) 400-bbl Produced Water Tanks Routed to Vapor Combustor - Revise	EU-TANKS-PW	-	-	<0.01	<0.01	-	-	<0.01	<0.01	<0.01	<0.01
Condensate Truck Loading w/ Vapor Return Routed to Combustor	EU-LOAD- COND	-	-	<0.01	0.02	-	-	0.23	0.02	0.06	0.32
Produced Water Truck Loading w/ Vapor Return Routed to Combustor	EU-LOAD-PW	-	-	<0.01	<0.01	-	-	<0.01	<0.01	<0.01	<0.01
One (1) 15.0-mmBtu/hr Vapor Combustor - Tank/Loading Stream	APC-COMB	-	-	<0.01	0.02	-	-	0.30	0.02	0.07	0.42
Vapor Combustor Pilot	EU-PILOT	-	-	<0.01	-	<0.01	-	<0.01	<0.01	-	<0.01
Fugitive Emissions - Revise	EU-FUG	-	-	<0.01	<0.01	-	-	0.06	<0.01	0.01	0.08
Fugitive Haul Road Emissions	EU-HR	-	-	-	-	-	-	-	-	-	-
Total Allowal	ble Emissions =	0.01	0.01	0.02	0.06	0.08	0.01	0.90	0.06	0.21	1.36
Current Permit Allowal	ble Emissions =	0.01	0.01	0.01	0.04	0.08	0.01	0.59	0.04	0.14	0.94
Net Allowal	ble Emissions =	0.00	0.00	0.01	0.02	0.00	0.00	0.31	0.02	0.07	0.42

Continued on Next Page

SWN Production Company, LLC Bonnette MSH Pad Summary of Hazardous Air Pollutants (Continued)

						Estimated En	nissions (TPY)				
Equipment	Unit ID	Acetalde- hyde	Acrolein	Benzene	Ethyl- benzene	Formalde- hyde	Methanol	n-Hexane	Toluene	Xylenes	Total HAP
145-hp Caterpillar G3306 NA Engine w/ Catalytic Converter	EU-ENG1	0.02	0.01	0.01	<0.01	0.09	0.02	-	<0.01	<0.01	0.15
145-hp Caterpillar G3306 NA Engine w/ Catalytic Converter	EU-ENG2	0.02	0.01	0.01	<0.01	0.09	0.02	i	<0.01	<0.01	0.15
146.2-kw Bucks GM Vortec 5.7L Engine	EU-ENG3	0.02	0.02	0.01	<0.01	0.16	0.02	-	<0.01	<0.01	0.24
Eight (8) 1.0-mmBtu/hr GPU Burners	EU-GPU1 to EU- GPU8	-	-	<0.01	-	<0.01	-	0.07	<0.01	-	0.07
Two (2) 0.5-mmBtu/hr Heater Treaters	EU-HT1 to EU- HT2	-	-	<0.01	-	<0.01	-	0.01	<0.01	-	0.01
Four (4) 400-bbl Condensate Tanks Routed to Vapor Combustor - Revise	EU-TANKS- COND	-	-	0.02	0.09	-	-	1.26	0.08	0.31	1.76
Four (4) 400-bbl Produced Water Tanks Routed to Vapor Combustor - Revise	EU-TANKS-PW	-	-	<0.01	<0.01	-	-	0.01	<0.01	<0.01	0.01
Condensate Truck Loading w/ Vapor Return Routed to Combustor	EU-LOAD- COND	-	-	0.01	0.07	-	-	1.01	0.07	0.25	1.41
Produced Water Truck Loading w/ Vapor Return Routed to Combustor	EU-LOAD-PW	-	-	<0.01	<0.01	-	-	0.01	<0.01	<0.01	0.01
One (1) 15.0-mmBtu/hr Vapor Combustor - Tank/Loading Stream	APC-COMB	-	-	0.02	0.10	-	-	1.31	0.09	0.32	1.84
Vapor Combustor Pilot	EU-PILOT	-	-	<0.01	-	<0.01	-	<0.01	<0.01	-	<0.01
Fugitive Emissions - Revise	EU-FUG	-	-	<0.01	0.01	-	-	0.26	0.01	0.05	0.34
Fugitive Haul Road Emissions	EU-HR	-	-	-	-	-	-	-	-	-	-
Total Allowa	ble Emissions =	0.05	0.05	0.08	0.28	0.34	0.06	3.93	0.27	0.94	5.99
Current Permit Allowa	ble Emissions =	0.05	0.05	0.06	0.18	0.34	0.06	2.60	0.18	0.62	4.14
Net Allowa	ble Emissions =	0.00	0.00	0.02	0.10	0.00	0.00	1.33	0.09	0.32	1.85

## SWN Production Company, LLC Bonnette MSH Pad

Summary of Greenhouse Gas Emissions - Metric Tons per Year (Tonnes)

Equipment	Unit ID	Carbon Die	oxide (CO <sub>2</sub> )	Methan	ne (CH <sub>4</sub> )	Methane (Cl	H <sub>4</sub> ) as CO <sub>2 Eq.</sub>	Nitrous O	xide (N <sub>2</sub> O)	Nitrous Oxide	(N <sub>2</sub> O) as CO <sub>2 Eq.</sub>	Total CO <sub>2</sub>	+ CO <sub>2 Eq.</sub> 1
Equipment	Unit iD	lb/hr	tonnes/yr	lb/hr	tonnes/yr	lb/hr	tonnes/yr	lb/hr	tonnes/yr	lb/hr	tonnes/yr	lb/hr	tonnes/yr
145-hp Caterpillar G3306 NA Engine w/ Catalytic Converter	EU-ENG1	155.04	616.04	<0.01	0.01	0.07	0.27	<0.01	<0.01	0.08	0.33	155.19	616.64
145-hp Caterpillar G3306 NA Engine w/ Catalytic Converter	EU-ENG2	155.04	616.04	<0.01	0.01	0.07	0.27	<0.01	<0.01	0.08	0.33	155.19	616.64
146.2-kw Bucks GM Vortec 5.7L Engine	EU-ENG3	206.41	820.16	<0.01	0.02	0.10	0.39	<0.01	<0.01	0.12	0.46	206.62	821.00
Eight (8) 1.0-mmBtu/hr GPU Burners	EU-GPU1 to EU- GPU8	935.82	3,718.44	0.02	0.07	0.44	1.75	<0.01	0.01	0.53	2.09	936.78	3,722.28
Two (2) 0.5-mmBtu/hr Heater Treaters	EU-HT1 to EU- HT2	116.98	464.80	<0.01	0.01	0.06	0.22	<0.01	<0.01	0.07	0.26	117.10	465.28
Four (4) 400-bbl Condensate Tanks Routed to Vapor Combustor	EU-TANKS- COND	-		-	-	-	-	-	-	-	-	-	-
Four (4) 400-bbl Produced Water Tanks Routed to Vapor Combustor - Revise	EU-TANKS-PW	-	=	-	-	-	-	-	-	-	-	=	-
Condensate Truck Loading w/ Vapor Return Routed to Combustor	EU-LOAD- COND	<0.01	<0.01	0.03	0.10	0.66	2.62	-	-	-	-	0.66	2.63
Produced Water Truck Loading w/ Vapor Return Routed to Combustor	EU-LOAD-PW	0.01	0.03	0.38	1.49	9.40	37.34	-	-	-	-	9.40	37.37
One (1) 15.0-mmBtu/hr Vapor Combustor - Tank/Loading Stream	APC-COMB	1,754.66	6,972.07	0.03	0.13	0.83	3.28	<0.01	0.01	0.99	3.92	1,756.47	6,979.27
Vapor Combustor Pilot	EU-PILOT	5.29	21.03	<0.01	<0.01	<0.01	0.01	<0.01	<0.01	<0.01	0.01	5.30	21.05
Fugitive Emissions - Revise	EU-FUG	0.01	0.04	1.53	6.09	38.25	152.18	-	-	-	-	38.26	152.22
Fugitive Haul Road Emissions	EU-HR	-		-	-	-	-	-	-	-	-	-	-
Total Allowa	ble Emissions =	3,329.24	13,228.63	1.99	7.93	49.87	198.34	0.01	0.02	1.86	7.39	3,380.97	13,434.38
Current Permit Allowa	ble Emissions =	3,329.24	13,228.62	1.45	5.77	36.37	144.37	0.01	0.02	1.86	7.39	3,367.47	13,380.38
Net Allowa	ble Emissions =	0.00	0.01	0.54	2.16	13.50	53.97	0.00	0.00	0.00	0.00	13.50	54.00

<sup>1</sup> CO2 Equivalent = Pollutant times GWP multiplier. 40 CFR 98 Table A-1, Global Warming Potential (GWP) multiplier (100-Year Time Horizon): CO2 = 1, CH4 = 25, N2O = 298

<sup>&</sup>lt;sup>2</sup> Per API Compendium (2009) Chapter 5: Because most of the CH<sub>4</sub> and CO<sub>2</sub> emissions from storage tanks occur as a result of flashing (which is controlled by the VRU in this case), working and breathing loss emissions of these gases are very small in production and virtually non-existent in the downstream segments. Therefore, GHG emissions from the condensate and produced water tanks are assumed to be negligible.

## SWN Production Company, LLC Bonnette MSH Pad

Summary of Greenhouse Gas Emissions - Short Tons per Year (Tons)

Equipment	Unit ID	Carbon Di	oxide (CO <sub>2</sub> )	Methar	ne (CH <sub>4</sub> )	Methane (C	H <sub>4</sub> ) as CO <sub>2 Eq.</sub>	Nitrous O	xide (N <sub>2</sub> O)	Nitrous Oxide	(N <sub>2</sub> O) as CO <sub>2 Eq.</sub>	Total CO	+ CO <sub>2 Eq.</sub> 1
Equipment	Official	lb/hr	tons/yr2	lb/hr	tons/yr2	lb/hr	tons/yr	lb/hr	tons/yr2	lb/hr	tons/yr	lb/hr	tons/yr
145-hp Caterpillar G3306 NA Engine w/ Catalytic Converter	EU-ENG1	155.04	679.06	<0.01	0.01	0.07	0.30	<0.01	<0.01	0.08	0.36	155.19	679.73
145-hp Caterpillar G3306 NA Engine w/ Catalytic Converter	EU-ENG2	155.04	679.06	<0.01	0.01	0.07	0.30	<0.01	<0.01	0.08	0.36	155.19	679.73
146.2-kw Bucks GM Vortec 5.7L Engine	EU-ENG3	206.41	904.07	<0.01	0.02	0.10	0.43	<0.01	<0.01	0.12	0.51	206.62	905.00
Eight (8) 1.0-mmBtu/hr GPU Burners	EU-GPU1 to EU- GPU8	935.82	4,098.88	0.02	0.08	0.44	1.93	<0.01	0.01	0.53	2.30	936.78	4,103.11
Two (2) 0.5-mmBtu/hr Heater Treaters	EU-HT1 to EU- HT2	116.98	512.36	<0.01	0.01	0.06	0.24	<0.01	<0.01	0.07	0.29	117.10	512.89
Four (4) 400-bbl Condensate Tanks Routed to Vapor Combustor	EU-TANKS- COND	-	-	-	-	-	-	-	-	-	-	-	-
Four (4) 400-bbl Produced Water Tanks Routed to Vapor Combustor - Revise	EU-TANKS-PW	-	-	÷	-	-	-	-	-	-	-	-	-
Condensate Truck Loading w/ Vapor Return Routed to Combustor	EU-LOAD- COND	<0.01	<0.01	0.03	0.12	0.66	2.89	-	-	-	-	0.66	2.89
Produced Water Truck Loading w/ Vapor Return Routed to Combustor	EU-LOAD-PW	0.01	0.03	0.38	1.65	9.40	41.16	-	-	-	-	9.40	41.19
One (1) 15.0-mmBtu/hr Vapor Combustor - Tank/Loading Stream	APC-COMB	1,754.66	7,685.39	0.03	0.14	0.83	3.62	<0.01	0.01	0.99	4.32	1,756.47	7,693.33
Vapor Combustor Pilot	EU-PILOT	5.29	23.18	<0.01	<0.01	<0.01	0.01	<0.01	<0.01	<0.01	0.01	5.30	23.21
Fugitive Emissions - Revise	EU-FUG	0.01	0.04	1.53	6.71	38.25	167.75	-	-	-	-	38.26	167.79
Fugitive Haul Road Emissions	EU-HR	-	-	-	-	-	-	-	-	-	-	-	-
Total Allowal	ble Emissions =	3,329.24	14,582.07	1.99	8.74	49.87	218.63	0.01	0.02	1.86	8.15	3,380.97	14,808.87
Current Permit Allowal	ble Emissions =	3,329.24	14,582.06	1.45	6.36	36.37	159.14	0.01	0.02	1.86	8.15	3,367.47	14,749.34
Net Allowal	ble Emissions =	0.00	0.01	0.54	2.38	13.50	59.49	0.00	0.00	0.00	0.00	13.50	59.53

<sup>1</sup> CO2 Equivalent = Pollutant times GWP multiplier. 40 CFR 98 Table A-1, Global Warming Potential (GWP) multiplier (100-Year Time Horizon): CO2 = 1, CH4 = 25, N2O = 298

<sup>&</sup>lt;sup>2</sup> EPA and API GHG calculation methodologies calculate emissions in metric tons (tonnes). These values have been converted to short tons for consistency with permitting threshold units.

<sup>&</sup>lt;sup>3</sup> Per API Compendium (2009) Chapter 5: Because most of the CH<sub>4</sub> and CO<sub>2</sub> emissions from storage tanks occur as a result of flashing (which is controlled by the VRU in this case), working and breathing loss emissions of these gases are very small in production and virtually non-existent in the downstream segments. Therefore, GHG emissions from the condensate and produced water tanks are assumed to be negligible.

### SWN Production Company, LLC Bonnette MSH Pad Engine Emissions Calculations - Criteria Air Pollutants

### **Equipment Information**

Unit ID:	EU-ENG1	EU-ENG2
Emission Point ID:	EP-ENG1	EP-ENG2
Make:	Caterpillar	Caterpillar
Model:	G3306 NA	G3306 NA
Design Class:	4S-RB	4S-RB
Controls:	NSCR	NSCR
Horsepower (hp):	145	145
Fuel Use (Btu/hp-hr):	8,625	8,625
Fuel Use (scfh):	1,382	1,382
Annual Fuel Use (mmscf):	12.11	12.11
Fuel Use (mmBtu/hr):	1.25	1.25
Exhaust Flow (acfm):	678	678
Exhaust Temp (°F):	1,101	1,101
Serial Number:	G6X08219	To be determined
Manufacture Date:	2/13/2015	After 1/1/2011
Operating Hours:	8,760	8,760
Fuel Heating Value (Btu/scf):	905	905
Uncontrolled Manufacturer Emission Factors	1	
NOx (g/hp-hr):	13.47	13.47
CO (g/hp-hr):	13.47	13.47
NMNEHC/VOC (g/hp-hr):	0.22	0.22
(3·1·4·1·1)		
Post-Catalyst Emission Factors		
NOx Control Eff. %	92.58%	92.58%
CO Control Eff. %	85.15%	85.15%

### **Uncontrolled Criteria Air Pollutant Emissions**

NOx (g/hp-hr): CO (g/hp-hr):

NMNEHC/VOC (g/hp-hr):

Unit ID: <u>EU-ENG1</u> <u>EU-ENG2</u>

1.00

2.00

0.22

1.00

2.00

0.22

Pollutant	lb/hr	TPY	lb/hr	TPY
NOx	4.31	18.88	4.31	18.88
CO	4.31	18.88	4.31	18.88
NMNEHC/VOC (does not include HCHO)	0.07	0.31	0.07	0.31
SO <sub>2</sub>	<0.01	<0.01	<0.01	<0.01
PM <sub>10/2.5</sub>	0.01	0.04	0.01	0.04
PM <sub>COND</sub>	0.01	0.04	0.01	0.04
PM <sub>TOT</sub>	0.02	0.09	0.02	0.09

### SWN Production Company, LLC Bonnette MSH Pad Engine Emissions Calculations - Criteria Air Pollutants (Continued)

### **Proposed Criteria Air Pollutant Emissions<sup>2</sup>**

Unit ID: <u>EU-ENG1</u> <u>EU-ENG2</u>

Pollutant	lb/hr	TPY	lb/hr	TPY
NOx	0.32	1.40	0.32	1.40
CO	0.64	2.80	0.64	2.80
NMNEHC/VOC (does not include HCHO)	0.07	0.31	0.07	0.31
SO <sub>2</sub>	<0.01	<0.01	<0.01	<0.01
PM <sub>10/2.5</sub>	0.01	0.04	0.01	0.04
$PM_COND$	0.01	0.04	0.01	0.04
PM <sub>TOT</sub>	0.02	0.09	0.02	0.09

### AP-42 Emission Factors (lb/mmBtu)<sup>3</sup>

### 4S-RB

Pollutant	3.2-3 (7/00)
SO <sub>2</sub>	5.88E-04
PM <sub>10/2.5</sub>	9.50E-03
$PM_{COND}$	9.91E-03
PM <sub>TOT</sub>	1.94E-02

<sup>&</sup>lt;sup>1</sup> Post-catalyst emission factors based on catalyst manufacturer data and/or NSPS Subpart JJJJ limits, if applicable. Per NSPS Subpart JJJJ, VOC limit does not include HCHO; therefore, HCHO emissions have been added to the NSPS JJJJ VOC emission rates for demonstration purposes only.

<sup>&</sup>lt;sup>2</sup> Per AP-42, all particulate matter (PM) from combustion of natural gas (total, condensable and filterable PM) is presumed <1 micrometer in diameter.

## SWN Production Company, LLC Bonnette MSH Pad Engine Emissions Calculations - Hazardous Air Pollutants

## **Equipment Information**

EU-ENG1	EU-ENG2
EP-ENG1	EP-ENG2
Caterpillar	Caterpillar
G3306 NA	G3306 NA
4S-RB	4S-RB
NSCR	NSCR
145	145
8,625	8,625
1,382	1,382
12.11	12.11
1.25	1.25
678	678
1,101	1,101
8,760	8,760
	EP-ENG1 Caterpillar G3306 NA 4S-RB NSCR 145 8,625 1,382 12.11 1.25 678 1,101

## **Manufacturer Formaldehyde Factor**

 Pre-Control (g/hp-hr):
 0.27 0.27 

 Control Efficiency<sup>1</sup>:
 76.00% 76.00% 

 Permit Factor (g/hp-hr):
 0.06 0.06 

## **Uncontrolled HAP Emissions**

Unit ID: <u>EU-ENG1</u> <u>EU-ENG2</u>

Pollutant	lb/hr	TPY	lb/hr	TPY
Acetaldehyde	<0.01	0.02	<0.01	0.02
Acrolein	<0.01	0.01	<0.01	0.01
Benzene	<0.01	0.01	<0.01	0.01
Ethylbenzene	<0.01	<0.01	<0.01	<0.01
Formaldehyde	0.09	0.38	0.09	0.38
Methanol	<0.01	0.02	<0.01	0.02
Toluene	<0.01	<0.01	<0.01	<0.01
Xylenes	<0.01	<0.01	<0.01	<0.01
Total HAPs =	0.10	0.44	0.10	0.44

## SWN Production Company, LLC Bonnette MSH Pad Engine Emissions Calculations - Hazardous Air Pollutants

## **Proposed HAP Emissions**

Unit ID: <u>EU-ENG1</u> <u>EU-ENG2</u>

Pollutant	lb/hr	TPY	lb/hr	TPY
Acetaldehyde	<0.01	0.02	<0.01	0.02
Acrolein	<0.01	0.01	<0.01	0.01
Benzene	<0.01	0.01	<0.01	0.01
Ethylbenzene	<0.01	<0.01	<0.01	<0.01
Formaldehyde	0.02	0.09	0.02	0.09
Methanol	<0.01	0.02	<0.01	0.02
Toluene	<0.01	<0.01	<0.01	<0.01
Xylenes	<0.01	<0.01	<0.01	<0.01
Total HAPs =	0.03	0.15	0.03	0.15

## AP-42 Emission Factors (lb/mmBtu)

## <u>4S-RB</u>

Pollutant	3.2-3 (7/00)
Acetaldehyde	2.79E-03
Acrolein	2.63E-03
Benzene	1.58E-03
Ethylbenzene	2.18E-05
Methanol	3.06E-03
Toluene	5.58E-04
Xylenes	1.95E-04

<sup>&</sup>lt;sup>1</sup> For conservative estimate, no reduction taken for any HAP other than formaldehyde.

### SWN Production Company, LLC Bonnette MSH Pad Engine Emissions Calculations - Greenhouse Gases

### **Equipment Information**

Unit ID:	EU-ENG1	EU-ENG2
Emission Point ID:	EP-ENG1	EP-ENG2
Make:	Caterpillar	Caterpillar
Model:	G3306 NA	G3306 NA
Design Class:	4S-RB	4S-RB
Controls:	NSCR	NSCR
Horsepower (hp):	145	145
Fuel Use (Btu/hp-hr):	8,625	8,625
Fuel Use (scfh):	1,382	1,382
Fuel Use (mmBtu/hr):	1.25	1.25
Exhaust Flow (acfm):	678	678
Exhaust Temp (°F):	1,101	1,101
Operating Hours:	8,760	8,760

Manufacturer data used to calculate CO<sub>2</sub> emissions (g/hp-hr):

485 485

## Greenhouse Gas (GHG) Emissions<sup>1</sup>

Unit ID: <u>EU-ENG1</u> <u>EU-ENG2</u>

Pollutant	lb/hr	tonnes/yr	lb/hr	tonnes/yr
$CO_2$	155.04	616.04	155.04	616.04
CH <sub>4</sub>	<0.01	0.01	<0.01	0.01
N₂O	<0.01	<0.01	<0.01	<0.01
CH <sub>4</sub> as CO <sub>2</sub> e	0.07	0.27	0.07	0.27
N <sub>2</sub> O as CO <sub>2</sub> e	0.08	0.33	0.08	0.33
Total CO <sub>2</sub> + CO <sub>2</sub> e =	155.19	616.64	155.19	616.64

## 40 CFR 98 Tables C-1 and C-2 Emission Factors (kg/mmBtu)<sup>2</sup>

Methane (CH <sub>4</sub> )	1.00E-03
Nitrous Oxide (N <sub>2</sub> O)	1.00E-04

### Notes:

40 CFR 98 Table A-1, Global Warming Potential (GWP) multiplier:  $CO_2 = 1$ ,  $CH_4 = 25$ ,  $N_2O = 298$ 

<sup>&</sup>lt;sup>1</sup> Conversion to short tons (tons) found in site-wide Summary of Greenhouse Gases - Short Tons per Year (tons) table.

<sup>&</sup>lt;sup>2</sup>CO<sub>2</sub>e = CO<sub>2</sub> equivalent (Pollutant times GWP multiplier):

### SWN Production Company, LLC Bonnette MSH Pad Proposed Engine Emissions Calculations - Criteria Air Pollutants

### **Equipment Information**

Unit ID: **EU-ENG3 Emission Point ID:** EP-ENG3 **Bucks** Make: GM Vortec 5.7L Model: 4S-RB Design Class: Capacity (kW): 146.2 Capacity(hp): 196.1 Fuel Use (Btu/kW-hr): 12,069 Fuel Use (scfh): 1,950 Annual Fuel Use (mmscf): 17.08 Fuel Use (mmBtu/hr): 1.76 after 1/1/2011 Manufacture Date: 8,760 Operating Hours: Fuel Heating Value (Btu/scf): 905

**Emission Factors**<sup>1</sup>

NMHC+NOx as NOx (g/kW-hr): 1.34 CO (g/kW-hr): 2.68 NMHC+NOx as VOC (g/kW-hr): 0.94

### **Proposed Criteria Air Pollutant Emissions**

Unit ID: <u>EU-ENG3</u>

Pollutant	lb/hr	TPY
NMHC+NOx as NOx	0.43	1.88
CO	0.86	3.77
NMHC+NOx as VOC	0.30	1.31
SO <sub>2</sub>	<0.01	<0.01
PM <sub>10/2.5</sub>	0.02	0.07
PM <sub>COND</sub>	0.02	0.08
PM <sub>TOT</sub>	0.03	0.15

### AP-42 Emission Factors (lb/mmBtu)<sup>2</sup>

Pollutant	3.2-3 (7/00)
SO <sub>2</sub>	5.88E-04
PM <sub>10/2.5</sub>	9.50E-03
PM <sub>COND</sub>	9.91E-03
PM <sub>TOT</sub>	1.94E-02

<sup>&</sup>lt;sup>1</sup> EU-ENG3 emissions factors are from NSPS Subpart JJJJ emission limits for Stage 2 engines, converted to g/kw-hr.

<sup>&</sup>lt;sup>2</sup> Per AP-42, all particulate matter (PM) from combustion of natural gas (total, condensable and filterable PM) is presumed <1 micrometer in diameter.

### SWN Production Company, LLC Bonnette MSH Pad Proposed Engine Emissions Calculations - Hazardous Air Pollutants

### **Equipment Information**

Unit ID: **EU-ENG3** Emission Point ID: EP-ENG3 Make: Bucks Model: GM Vortec 5.7L 4S-RB Design Class: Capacity (kW): 146.2 Fuel Use (Btu/kW-hr): 12,069 Fuel Use (scfh): 1,950

Annual Fuel Use (mmscf): 17.08
Fuel Use (mmBtu/hr): 1.76
Manufacture Date: after 1/1/2011
Operating Hours: 8,760

Fuel Heating Value (Btu/scf): 905

### **Proposed HAP Emissions**

Unit ID: <u>EU-ENG3</u>

Pollutant	lb/hr	TPY
Acetaldehyde	<0.01	0.02
Acrolein	<0.01	0.02
Benzene	<0.01	0.01
Ethylbenzene	<0.01	<0.01
Formaldehyde	0.04	0.16
Methanol	0.01	0.02
Toluene	<0.01	<0.01
Xylenes	<0.01	<0.01
Total HAP =	0.06	0.24

### AP-42 Emission Factors (lb/mmBtu)

Pollutant	3.2-3 (7/00)
Acetaldehyde	2.79E-03
Acrolein	2.63E-03
Benzene	1.58E-03
Ethylbenzene	2.18E-05
Formaldehyde	2.05E-02
Methanol	3.06E-03
Toluene	5.58E-04
Xylenes	1.95E-04

### **SWN Production Company, LLC Bonnette MSH Pad Proposed Engine Emissions Calculations - Greenhouse Gases**

### **Equipment Information**

Unit ID: **EU-ENG3** EP-ENG3 Emission Point ID: Make: Bucks Model: GM Vortec 5.7L Design Class: 4S-RB **NSCR** Controls: Capacity (kW): 146.2 Fuel Use (Btu/kW-hr): 12,069 Fuel Use (scfh): 1,950 Annual Fuel Use (mmscf): 17.08 Fuel Use (mmBtu/hr): 1.76 8,760 Operating Hours: 905

Fuel Heating Value (Btu/scf):

### **Greenhouse Gas (GHG) Emissions**

Unit ID: **EU-ENG3** 

Pollutant	lb/hr	tonnes/yr
CO <sub>2</sub>	206.41	820.16
CH <sub>4</sub>	<0.01	0.02
$N_2O$	<0.01	<0.01
CH₄ as CO₂e	0.10	0.39
N <sub>2</sub> O as CO <sub>2</sub> e	0.12	0.46
Total CO <sub>2</sub> + CO <sub>2</sub> e =	206.62	821.00

### 40 CFR 98 Tables C-1 and C-2 Emission Factors (kg/mmBtu)<sup>1</sup>

Carbon Dioxide (CO <sub>2</sub> )	53.06
Methane (CH <sub>4</sub> )	1.00E-03
Nitrous Oxide (N <sub>2</sub> O)	1.00E-04

### Notes:

40 CFR 98 Table A-1, Global Warming Potential (GWP) multiplier: CO<sub>2</sub> = 1, CH<sub>4</sub> = 25, N<sub>2</sub>O = 298

<sup>&</sup>lt;sup>1</sup>CO<sub>2</sub>e = CO<sub>2</sub> equivalent (Pollutant times GWP multiplier):

# SWN Production Company, LLC Bonnette MSH Pad Gas Production Unit Burner Emissions Calculations - Criteria Air Pollutants

### **Equipment Information**

Unit ID: <u>EU-GPU1 - EU-GPU8 (EACH)</u>

Emission Point ID: EP-GPU1 - EP-GPU8

Description: Gas Production Unit Burner

Number of Units: 8

Burner Design (mmBtu/hr): 1.0

Fuel HHV (Btu/scf): 905
Annual Fuel Use (mmscf): 9.68
Annual Operating Hours: 8,760

### **Criteria Air Pollutant Emissions**

Unit ID: <u>EU-GPU1 - EU-GPU8 (EACH)</u> <u>EU-GPU1 - EU-GPU8 (TOTAL)</u>

Pollutant	lb/hr	TPY	lb/hr	TPY
NOx	0.11	0.48	0.88	3.84
CO	0.09	0.39	0.72	3.12
VOC	0.01	0.03	0.05	0.24
SO <sub>2</sub>	<0.01	<0.01	<0.01	<0.02
PM <sub>10/2.5</sub>	0.01	0.03	0.05	0.22
PM <sub>COND</sub>	<0.01	0.01	<0.02	<0.07
PM <sub>TOT</sub>	0.01	0.04	0.07	0.29

## AP-42 Emission Factors for Units <100 mmBtu/hr (lb/mmscf)<sup>1</sup>

Pollutant	1.4-1, -2 (7/98)
NOx	100.0
СО	84.0
VOC	5.5
SO <sub>2</sub>	0.6
PM <sub>10/2.5</sub>	5.7
PM <sub>COND</sub>	1.9
PM <sub>TOT</sub>	7.6

<sup>&</sup>lt;sup>1</sup> All PM (total, condensable and filterable) is assumed to be <1 micrometer in diameter. Total PM is the sum of filterable PM and condensable PM.

## SWN Production Company, LLC Bonnette MSH Pad Gas Production Unit Burner Emissions Calculations - Hazardous Air Pollutants

### **Equipment Information**

Unit ID: <u>EU-GPU1 - EU-GPU8 (EACH)</u>

Emission Point ID: EP-GPU1 - EP-GPU8

Description: Gas Production Unit Burner

Number of Units: 8

Burner Design (mmBtu/hr): 1.0
Fuel HHV (Btu/scf): 905

Fuel HHV (Btu/scf): 905
Annual Fuel Use (mmscf): 9.68
Annual Operating Hours: 8,760

### **Hazardous Air Pollutant Emissions**

Unit ID: <u>EU-GPU1 - EU-GPU8 (EACH)</u> <u>EU-GPU1 - EU-GPU8 (TOTAL)</u>

Pollutant	lb/hr	TPY	lb/hr	TPY
n-Hexane	<0.01	0.01	<0.02	<0.07
Formaldehyde	<0.01	<0.01	<0.01	<0.01
Benzene	<0.01	<0.01	<0.01	<0.01
Toluene	<0.01	<0.01	<0.01	<0.01
Total HAPs =	<0.01	0.01	0.02	0.07

### **AP-42 Emission Factors (lb/mmscf)**

Pollutant	1.4-3 (7/98)
n-Hexane	1.80E+00
Formaldehyde	7.50E-02
Benzene	2.10E-03
Toluene	3.40E-03

### SWN Production Company, LLC Bonnette MSH Pad Gas Production Unit Burner Emissions Calculations - Greenhouse Gases

### **Equipment Information**

Unit ID: <u>EU-GPU1 - EU-GPU8 (EACH)</u>

Emission Point ID: EP-GPU1 - EP-GPU8

Description: Gas Production Unit Burner

Number of Units: 8

Burner Design (mmBtu/hr): 1.0
Fuel HHV (Btu/scf): 905
Annual Fuel Use (mmscf): 9.68

Annual Operating Hours: 8,760

### Greenhouse Gas (GHG) Emissions<sup>1</sup>

Unit ID: <u>EU-GPU1 - EU-GPU8 (EACH)</u> <u>EU-GPU1 - EU-GPU8 (TOTAL)</u>

Pollutant	lb/hr	tonnes/yr	lb/hr	tonnes/yr
$CO_2$	116.98	464.80	935.82	3,718.44
CH₄	<0.01	0.01	<0.02	<0.07
N₂O	<0.01	<0.01	<0.01	<0.01
CH₄ as CO₂e	0.06	0.22	0.44	1.75
N <sub>2</sub> O as CO <sub>2</sub> e	0.07	0.26	0.53	2.09
Total CO <sub>2</sub> + CO <sub>2</sub> e =	117.10	465.28	936.78	3,722.28

### 40 CFR 98 Tables C-1 and C-2 Emission Factors (kg/mmBtu)<sup>2</sup>

Carbon Dioxide (CO <sub>2</sub> )	53.06
Methane (CH <sub>4</sub> )	1.00E-03
Nitrous Oxide (N <sub>2</sub> O)	1.00E-04

<sup>&</sup>lt;sup>1</sup> Conversion to short tons (tons) found in site-wide Summary of Greenhouse Gases - Short Tons per Year (tons) table.

<sup>&</sup>lt;sup>2</sup>CO<sub>2</sub>e = CO<sub>2</sub> equivalent (Pollutant times GWP multiplier):

<sup>40</sup> CFR 98 Table A-1, Global Warming Potential (GWP) multiplier: CO<sub>2</sub> = 1, CH<sub>4</sub> = 25, N<sub>2</sub>O = 298

### SWN Production Company, LLC Bonnette MSH Pad Heater Treater Emissions Calculations - Criteria Air Pollutants

### **Equipment Information**

Unit ID: EU-HT1 - EU-HT2 (EACH)

Emission Point ID: EP-HT1 - EP-HT2

Description: Heater Treater

Number of Units: 2

Burner Design (mmBtu/hr): 0.5

Fuel HHV (Btu/scf): 905

Annual Fuel Use (mmscf): 4.84
Annual Operating Hours: 8,760

### **Criteria Air Pollutant Emissions**

Unit ID: <u>EU-HT1 - EU-HT2 (EACH)</u> <u>EU-HT1 and EU-HT2 (TOTAL)</u>

Pollutant	lb/hr	TPY	lb/hr	TPY
NOx	0.06	0.26	0.12	0.52
CO	0.05	0.22	0.10	0.44
VOC	<0.01	0.01	0.01	0.02
SO <sub>2</sub>	<0.01	<0.01	<0.01	<0.01
PM <sub>10/2.5</sub>	<0.01	0.01	0.01	0.03
PM <sub>COND</sub>	<0.01	<0.01	<0.01	0.01
PM <sub>TOT</sub>	<0.01	0.02	0.01	0.04

### AP-42 Emission Factors for Units <100 mmBtu/hr (lb/mmscf)<sup>1</sup>

Pollutant	1.4-1, -2 (7/98)
NOx	100.0
CO	84.0
VOC	5.5
SO <sub>2</sub>	0.6
PM <sub>10/2.5</sub>	5.7
PM <sub>COND</sub>	1.9
PM <sub>TOT</sub>	7.6

<sup>&</sup>lt;sup>1</sup> All PM (total, condensable and filterable) is assumed to be <1 micrometer in diameter. Total PM is the sum of filterable PM and condensable PM.

### SWN Production Company, LLC Bonnette MSH Pad Heater Treater Emissions Calculations - Hazardous Air Pollutants

### **Equipment Information**

Unit ID: <u>EU-HT1 - EU-HT2 (EACH)</u>

Emission Point ID: EP-HT1 - EP-HT2

Description: Heater Treater

Description.

Number of Units: 2

Burner Design (mmBtu/hr): 0.5
Fuel HHV (Btu/scf): 905
Annual Fuel Use (mmscf): 4.84
Annual Operating Hours: 8,760

### **Hazardous Air Pollutant Emissions**

Unit ID: <u>EU-HT1 - EU-HT2 (EACH)</u> <u>EU-HT1 and EU-HT2 (TOTAL)</u>

Pollutant	lb/hr	TPY	lb/hr	TPY
n-Hexane	<0.01	<0.01	<0.01	0.01
Formaldehyde	<0.01	<0.01	<0.01	<0.01
Benzene	<0.01	<0.01	<0.01	<0.01
Toluene	<0.01	<0.01	<0.01	<0.01
Total HAPs =	<0.01	<0.01	<0.01	0.01

### AP-42 Emission Factors (lb/mmscf)

Pollutant	1.4-3 (7/98)
n-Hexane	1.80E+00
Formaldehyde	7.50E-02
Benzene	2.10E-03
Toluene	3.40E-03

### SWN Production Company, LLC Bonnette MSH Pad Heater Treater Emissions Calculations - Greenhouse Gases

### **Equipment Information**

Unit ID: EU-HT1 - EU-HT2 (EACH)

Emission Point ID: EP-HT1 - EP-HT2

Description: Heater Treater

Number of Units: 2
Burner Design (mmBtu/hr): 0.5

Fuel HHV (Btu/scf): 905
Annual Fuel Use (mmscf): 4.84
Annual Operating Hours: 8,760

### Greenhouse Gas (GHG) Emissions<sup>1</sup>

Unit ID: <u>EU-HT1 - EU-HT2 (EACH)</u> <u>EU-HT1 and EU-HT2 (TOTAL)</u>

Pollutant	lb/hr	tonnes/yr	lb/hr	tonnes/yr
$CO_2$	58.49	232.40	116.98	464.80
CH₄	<0.01	<0.01	<0.01	<0.01
$N_2O$	<0.01	<0.01	<0.01	<0.01
CH₄ as CO₂e	0.03	0.11	0.06	0.22
N₂O as CO₂e	0.03	0.13	0.07	0.26
Total CO <sub>2</sub> + CO <sub>2</sub> e =	58.55	232.64	117.10	465.28

### 40 CFR 98 Tables C-1 and C-2 Emission Factors (kg/mmBtu)<sup>2</sup>

Carbon Dioxide (CO <sub>2</sub> )	53.06
Methane (CH <sub>4</sub> )	1.00E-03
Nitrous Oxide (N <sub>2</sub> O)	1.00E-04

<sup>&</sup>lt;sup>1</sup> Conversion to short tons (tons) found in site-wide Summary of Greenhouse Gases - Short Tons per Year (tons) table.

 $<sup>^{2}</sup>$  CO<sub>2</sub>e = CO<sub>2</sub> equivalent (Pollutant times GWP multiplier):

<sup>40</sup> CFR 98 Table A-1, Global Warming Potential (GWP) multiplier:  $CO_2 = 1$ ,  $CH_4 = 25$ ,  $N_2O = 298$ 

### SWN Production Company, LLC Bonnette MSH Pad Storage Tank Emissions - Criteria Air Pollutants

### **Tank Information**

Unit ID:	EU-TANKS-COND	<b>EU-TANKS-PW</b>
Emission Point ID:	APC-COMB	APC-COMB
Contents: 1	Condensate	Produced Water
Number of Tanks: 2	4	4
Capacity (bbl) - Per Tank:	400	400
Capacity (gal) - Per Tank:	16,800	16,800
Total:		
Throughput (bbl/yr):	474,500	365,000
Throughput (gal/yr):	19,929,000	15,330,000
Throughput (bbl/d):	1,300	1,000
Per Tank:		
Throughput (bbl/yr):	118,625	91250
Throughput (gal/yr):	4,982,250	3,832,500
Throughput (bbl/d):	325.00	250.00
Tank Flashing Emission Factor (lb/bbl):	4.50	0.03
Working Losses (lb/yr): 3	8,574.22	82.41
Breathing Losses (lb/yr): 3	1,155.38	11.00
Turnovers:	1,186.25	912.50
Tank Vapor Capture Efficiency:	100%	100%
Captured Vapors Routed to:	Vapor Combustor	Vapor Combustor

### **Uncontrolled Storage Tank Emissions**

Unit ID: <u>EU-TANKS-COND</u> <u>EU-TANKS-PW</u>

Emissions	lb/hr	TPY	lb/hr	TPY
Working Losses	3.92	17.16	0.04	0.16
Breathing Losses	0.53	2.32	0.01	0.04
Flashing Losses	243.75	1,067.63	1.25	5.48
Total VOC =	248.20	1,087.11	1.30	5.68
Per Tank =	62.05	271.78	0.32	1.42

SWN Production Company, LLC Bonnette MSH Pad Storage Tank Emissions - Criteria Air Pollutants (Continued)

### **Controlled Storage Tank Emissions**

Unit ID: <u>EU-TANKS-COND</u> <u>EU-TANKS-PW</u>

Emissions	lb/hr	TPY	lb/hr	TPY
Working Losses	0.08	0.34	<0.01	<0.01
Breathing Losses	0.01	0.05	<0.01	<0.01
Flashing Losses	4.88	21.35	0.03	0.11
Total VOC =	4.96	21.74	0.03	0.11
Per Tank =	1.24	5.44	0.01	0.03

<sup>&</sup>lt;sup>1</sup> Produced water tanks assumed to contain 99% produced water and 1% condensate.

<sup>&</sup>lt;sup>2</sup> SWN requests to combine working, breathing and flashing emissions from each tank type to be combined into one emissions point with a total throughput limit rather than an individual tank limit.

<sup>&</sup>lt;sup>3</sup> Tank working and breathing emissions were calculated using maximum throughput per tank in EPA TANKS 4.0.9d. Flashing calculated using Promax process simulation. Reports located in Attachment L. Uncontrolled tank working/breathing/flashing emissions are routed to a vapor combustor with 100% capture efficiency.

SWN Production Company, LLC Bonnette MSH Pad Storage Tank Emissions - Hazardous Air Pollutants

### **Uncontrolled Storage Tank Emissions**

Unit ID: <u>EU-TANKS-COND</u> <u>EU-TANKS-PW</u>

Pollutant	lb/hr	TPY	lb/hr	TPY
Total VOC = 1	248.20	1,087.11	1.30	5.68
n-Hexane	14.35	62.87	0.07	0.33
Benzene	0.17	0.76	<0.01	<0.01
Toluene	0.97	4.24	0.01	0.02
Ethylbenzene	1.05	4.58	0.01	0.02
Xylenes	3.55	15.57	0.02	0.08
Total HAP =	20.09	88.01	0.10	0.46

## **Controlled Storage Tank Emissions<sup>2</sup>**

Unit ID: <u>EU-TANKS-COND</u> <u>EU-TANKS-PW</u>

Pollutant	lb/hr	TPY	lb/hr	TPY
Total VOC = 1	4.96	21.74	0.03	0.11
n-Hexane	0.29	1.26	<0.01	0.01
Benzene	<0.01	0.02	<0.01	<0.01
Toluene	0.02	0.08	<0.01	<0.01
Ethylbenzene	0.02	0.09	<0.01	<0.01
Xylenes	0.07	0.31	<0.01	<0.01
Total HAP =	0.40	1.76	<0.01	0.01

SWN Production Company, LLC Bonnette MSH Pad Storage Tank Emissions - Hazardous Air Pollutants (Continued)

## Estimated HAP Composition (% by Weight)<sup>3</sup>

Pollutant	Wt%
n-Hexane	5.783%
Benzene	0.070%
Toluene	0.390%
Ethylbenzene	0.421%
Xylenes	1.432%
Total HAP =	8.096%

<sup>&</sup>lt;sup>1</sup> VOC emissions calculated in Criteria Air Pollutant calculations.

<sup>&</sup>lt;sup>2</sup> Uncontrolled tank working/breathing/flashing emissions are routed to a vapor combustor with 100% capture efficiency.

<sup>&</sup>lt;sup>3</sup> Speciated liquids analysis located in Fugitive Emissions Calculations. HAP weight % calculated as % of total hydrocarbons in the sample. All HAP assumed to volatilize from liquids for most conservative emissions estimate.

### **SWN Production Company, LLC Bonnette MSH Pad** Condensate Truck Loading Emissions - Criteria and Hazardous Air Pollutants

### **Loading Information**

**EU-LOAD-COND** Unit ID:

**Emission Point ID:** APC-COMB

> Submerged Fill Method:

Type of Service: Dedicated Mode of Operation: Normal

Saturation Factor: 0.6

Em. Factor (lb/1000 gal): 1 5.81

Throughput (1000 gal): 19,929

Control Type: Vapor Return/Combustion

Vapor Capture Efficiency: 2 70% Average Fill Rate (gal/hr): 7,500

Captured Vapors Routed to: Vapor Combustor

7.925	= P, True vapor pressure of liquid loaded (max psia) <sup>3</sup>
50.028	= M, Molecular weight of vapor (lb/lb-mol)
50.33	= T, Temperature of bulk liquid loaded (average °F)
510.33	= T, Temperature of bulk liquid loaded ( °F + 460 = °R)

### Uncontrolled Loading Emissions<sup>4</sup>

Pollutant	Max. lb/hr	Avg. lb/hr	TPY
VOC =	43.58	13.22	57.89
n-Hexane	2.52	0.76	3.35
Benzene	0.03	0.01	0.04
Toluene	0.17	0.05	0.23
Ethylbenzene	0.18	0.06	0.24
Xylenes	0.62	0.19	0.83
Total HAP <sup>5</sup> =	3.53	1.07	4.69

# SWN Production Company, LLC Bonnette MSH Pad Condensate Truck Loading Emissions - Criteria and Hazardous Air Pollutants (Continued)

### Uncaptured Loading Emissions<sup>4</sup>

Pollutant	Max. lb/hr	Avg. lb/hr	TPY
VOC =	13.07	3.97	17.37
n-Hexane	0.76	0.23	1.01
Benzene	0.01	<0.01	0.01
Toluene	0.05	0.02	0.07
Ethylbenzene	0.06	0.02	0.07
Xylenes	0.19	0.06	0.25
Total HAP <sup>5</sup> =	1.06	0.32	1.41

<sup>&</sup>lt;sup>5</sup> Speciated liquids analysis located in Fugitive Emissions Calculations. HAP weight % calculated as % of total hydrocarbons in the sample. All HAP assumed to volatilize from liquids for most conservative emissions estimate.

Pollutant	Wt%
n-Hexane	5.783%
Benzene	0.070%
Toluene	0.390%
Ethylbenzene	0.421%
Xylenes	1.432%
Total HAPs =	8.096%

 $<sup>^{1}</sup>$  AP-42 5.2-4 Eq.1: Loading Loss (lb/1000 gal) = 12.46 \*S\*P\*M/T.

<sup>&</sup>lt;sup>2</sup> Uncontrolled emissions that are captured by the collection system are routed to a vapor combustor. Per AP-42 5.2-6, 70% capture efficiency can be assumed for trucks not subject to NSPS. Uncaptured emissions shown represent those not captured by the collection system or controlled by the vapor combustor.

<sup>&</sup>lt;sup>3</sup> AP-42 Section 7.1 - Properties of Selected Petroleum Liquids correlation with RVP estimated based on stabilization process.

<sup>&</sup>lt;sup>4</sup> Maximum lb/hr based on average hourly truck loading rate. Average lb/hr based on TPY conversion assuming continuous operation.

#### SWN Production Company, LLC Bonnette MSH Pad Condensate Truck Loading Emissions - Greenhouse Gases

#### **Loading Information**

Unit ID: <u>EU-LOAD-COND</u>

Emission Point ID: APC-COMB
Fill Method: Submerged

Type of Service: Dedicated Mode of Operation: Normal

TOC Em. Factor (tonne/10<sup>6</sup> gal): <sup>1</sup> 0.91

Throughput (10<sup>6</sup> gal): 19.929

Control Type: Vapor Return/Combustion

Vapor Capture Efficiency: <sup>2</sup> 70.00%

Average Fill Rate (gal/hr): 7,500

Captured Vapors Routed to: Vapor Combustor

Input  $CH_4$  from Promax = 1.9277% Input  $CO_2$  from Promax = 0.0586%

## Uncontrolled Loading Emissions<sup>3, 4</sup>

Pollutant	Max. lb/hr	Avg. lb/hr	tonnes/yr	tons/yr
CH <sub>4</sub>	0.29	0.09	0.35	0.39
CH <sub>4</sub> as CO <sub>2</sub> e	7.25	2.20	8.74	9.63
CO <sub>2</sub>	0.01	<0.01	0.01	0.01
Total CO <sub>2</sub> + CO <sub>2</sub> e =	7.26	2.20	8.75	9.65

# SWN Production Company, LLC Bonnette MSH Pad Condensate Truck Loading Emissions - Greenhouse Gases (Continued)

## **Uncaptured Loading Emissions**<sup>3, 4</sup>

Pollutant	Max. lb/hr	Avg. lb/hr	tonnes/yr	tons/yr
CH₄	0.09	0.03	0.10	0.12
CH <sub>4</sub> as CO <sub>2</sub> e	2.18	0.66	2.62	2.89
$CO_2$	<0.01	<0.01	<0.01	<0.01
Total CO <sub>2</sub> + CO <sub>2</sub> e =	2.18	0.66	2.63	2.89

#### **API Compendium Table 5-12**

Loading Type	Emission Factor (tonne TOC/10 <sup>6</sup> gal)
Rail/Truck - Submerged Loading - Dedicated Normal Service	0.91
Rail/Truck - Submerged Loading - Vapor Balance Service	1.51
Rail/Truck - Splash Loading - Dedicated Normal Service	/ / / /
Rail/Truck - Splash Loading - Vapor Balance Service	1.51
Marine Loading - Ships/Ocean Barges	0.28
Marine Loading - Barges	0.45

<sup>&</sup>lt;sup>1</sup> API Compendium of Greenhouse Gas Emissions Methodologies for the Oil and Gas Industry, Table 5-12.

<sup>&</sup>lt;sup>2</sup> Uncontrolled emissions that are captured by the collection system are routed to a vapor combustor. Per AP-42 5.2-6, 70% capture efficiency can be assumed for trucks not subject to NSPS. Uncaptured emissions shown represent those not captured by the collection system or controlled by the vapor combustor.

<sup>&</sup>lt;sup>3</sup> Maximum lb/hr based on average hourly truck loading rate. Average lb/hr based on TPY conversion assuming continuous operation.

<sup>&</sup>lt;sup>4</sup>CO<sub>2</sub>e = CO<sub>2</sub> equivalent (Pollutant times GWP multiplier):

<sup>40</sup> CFR 98 Table A-1, Global Warming Potential (GWP) multiplier:  $CO_2 = 1$ ,  $CH_4 = 25$ 

#### SWN Production Company, LLC Bonnette MSH Pad Produced Water Truck Loading Emissions - Criteria and Hazardous Air Pollutants

#### **Loading Information**

Unit ID: <u>EU-LOAD-PW</u>

Emission Point ID: APC-COMB
Fill Method: Submerged

Fill Metriod. Submerged

Type of Service: Dedicated Mode of Operation: Normal

ode of Operation.

Saturation Factor: 0.6

Em. Factor (lb/1000 gal): 1 0.07

Throughput (1000 gal): 15,330

Control Type: Vapor Return/Combustion

Vapor Capture Efficiency: <sup>2</sup> 70% Average Fill Rate (gal/hr): 7,500

Captured Vapors Routed to: Vapor Combustor

0.2427	= P, True vapor pressure of liquid loaded (max psia)
20.1493	= M, Molecular weight of vapor (lb/lb-mol)
50.33	= T, Temperature of bulk liquid loaded (average °F)
510.33	= T, Temperature of bulk liquid loaded ( °F + 460 = °R)

### **Uncontrolled Loading Emissions**<sup>3</sup>

Pollutant	Max. lb/hr	Avg. lb/hr	TPY
VOC =	0.53	0.12	0.54
n-Hexane	0.03	0.01	0.03
Benzene	<0.01	<0.01	<0.01
Toluene	<0.01	<0.01	<0.01
Ethylbenzene	<0.01	<0.01	<0.01
Xylenes	0.01	<0.01	0.01
Total HAP <sup>4</sup> =	0.04	0.01	0.04

# SWN Production Company, LLC Bonnette MSH Pad Produced Water Truck Loading Emissions - Criteria and Hazardous Air Pollutants (Continued)

#### **Uncaptured Loading Emissions<sup>3</sup>**

Pollutant	Max. lb/hr	Avg. lb/hr	TPY
VOC =	0.16	0.04	0.16
n-Hexane	0.01	<0.01	0.01
Benzene	<0.01	<0.01	<0.01
Toluene	<0.01	<0.01	<0.01
Ethylbenzene	<0.01	<0.01	<0.01
Xylenes	<0.01	<0.01	<0.01
Total HAP <sup>4</sup> =	0.01	<0.01	0.01

<sup>&</sup>lt;sup>4</sup> Speciated liquids analysis located in Fugitive Emissions Calculations. HAP weight % calculated as % of total hydrocarbons in the sample. All HAP assumed to volatilize from liquids for most conservative emissions estimate.

Pollutant	Wt%
n-Hexane	5.783%
Benzene	0.070%
Toluene	0.390%
Ethylbenzene	0.421%
Xylenes	1.432%
Total HAPs =	8.096%

<sup>&</sup>lt;sup>1</sup> AP-42 5.2-4 Eq.1: Loading Loss (lb/1000 gal) = 12.46 \*S\*P\*M/T. Properties based on mixture of 99% water and 1% condensate.

<sup>&</sup>lt;sup>2</sup> Uncontrolled emissions that are captured by the collection system are routed to a vapor combustor. Per AP-42 5.2-6, 70% capture efficiency can be assumed for trucks not subject to NSPS. Uncaptured emissions shown represent those not captured by the collection system or controlled by the vapor combustor.

<sup>&</sup>lt;sup>3</sup> Maximum lb/hr based on average hourly truck loading rate. Average lb/hr based on TPY conversion assuming continuous operation.

#### SWN Production Company, LLC Bonnette MSH Pad Produced Water Truck Loading Emissions - Greenhouse Gases

#### **Loading Information**

Unit ID: <u>EU-LOAD-PW</u>

Emission Point ID: APC-COMB

Fill Method: Submerged pe of Service: Dedicated

Type of Service: Dedicated Mode of Operation: Normal

TOC Em. Factor (tonne/10<sup>6</sup> gal): <sup>1</sup> 0.91

Throughput (10<sup>6</sup> gal): 15.330

Control Type: Vapor Return/Combustion

Vapor Capture Efficiency: <sup>2</sup> 70.00% Average Fill Rate (gal/hr): 7,500

Captured Vapors Routed to: Vapor Combustor

## Uncontrolled Loading Emissions<sup>3, 4</sup>

Pollutant	Max. lb/hr	Avg. lb/hr	tonnes/yr	tons/yr
CH <sub>4</sub>	5.37	1.25	4.98	5.49
CH <sub>4</sub> as CO <sub>2</sub> e	134.26	31.33	124.48	137.21
CO <sub>2</sub>	0.09	0.02	0.08	0.09
Total CO <sub>2</sub> + CO <sub>2</sub> e =	134.35	31.35	124.56	137.30

# SWN Production Company, LLC Bonnette MSH Pad Produced Water Truck Loading Emissions - Greenhouse Gases (Continued)

## **Uncaptured Loading Emissions**<sup>3, 4</sup>

Pollutant	Max. lb/hr	Avg. lb/hr	tonnes/yr	tons/yr
CH <sub>4</sub>	1.61	0.38	1.49	1.65
CH <sub>4</sub> as CO <sub>2</sub> e	40.28	9.40	37.34	41.16
$CO_2$	0.03	0.01	0.03	0.03
Total CO <sub>2</sub> + CO <sub>2</sub> e =	40.30	9.40	37.37	41.19

#### **API Compendium Table 5-12**

Loading Type	Emission Factor (tonne TOC/10 <sup>6</sup> gal)
Rail/Truck - Submerged Loading - Dedicated Normal Service	0.91
Rail/Truck - Submerged Loading - Vapor Balance Service	1.51
Rail/Truck - Splash Loading - Dedicated Normal Service	2 20
Rail/Truck - Splash Loading - Vapor Balance Service	1.51
Marine Loading - Ships/Ocean Barges	0.28
Marine Loading - Barges	0.45

<sup>&</sup>lt;sup>1</sup> API Compendium of Greenhouse Gas Emissions Methodologies for the Oil and Gas Industry, Table 5-12.

<sup>&</sup>lt;sup>2</sup> Uncontrolled emissions that are captured by the collection system are routed to a vapor combustor. Per AP-42 5.2-6, 70% capture efficiency can be assumed for trucks not subject to NSPS. Uncaptured emissions shown represent those not captured by the collection system or controlled by the vapor combustor.

<sup>&</sup>lt;sup>3</sup> Maximum lb/hr based on average hourly truck loading rate. Average lb/hr based on TPY conversion assuming continuous operation.

<sup>&</sup>lt;sup>4</sup>CO<sub>2</sub>e = CO<sub>2</sub> equivalent (Pollutant times GWP multiplier):

<sup>40</sup> CFR 98 Table A-1, Global Warming Potential (GWP) multiplier:  $CO_2 = 1$ ,  $CH_4 = 25$ 

## SWN Production Company, LLC Bonnette MSH Pad

Tanks/Loading Vapor Combustor Emissions Calculations - Criteria and Hazardous Air Pollutants

#### Criteria and Hazardous Air Pollutant Emissions

		Emission	Total Captured Emissions <sup>2</sup>		Combustor Destruction Efficiency	Total Controlled Emissions (Post- Capture and Combustion)	
Unit ID	Pollutant	Factors <sup>1</sup>	lb/hr	TPY	%	lb/hr	TPY
	NOx	0.138	-	-	-	2.07	9.07
APC-COMB	СО	0.2755	-		-	4.13	18.09
	PM	7.6	ı		-	0.04	0.18
	VOC	Mass Balance	258.83	1,133.69	98.00%	5.18	22.69
	n-Hexane	Mass Balance	14.96	65.57	98.00%	0.30	1.31
	Benzene	Mass Balance	0.18	0.79	98.00%	<0.01	0.02
	Toluene	Mass Balance	1.02	4.42	98.00%	0.02	0.09
	Ethylbenzene	Mass Balance	1.10	4.77	98.00%	0.02	0.10
	Xylenes	Mass Balance	3.70	16.24	98.00%	0.07	0.32

#### Notes:

Hours per Year: 8,760 Number of Combustors: 1

NOx and CO emission factors (lb/mmBtu): *TCEQ Air Permit Technical Guidance for Chemical Sources: Flares and Vapor Oxidizers:* High Btu waste streams (>1,000 Btu/scf) based on heat input to the combustor =

15.00 mmBtu/hr Total Heat Input

<sup>&</sup>lt;sup>1</sup> Although a vapor combustor is not considered a flare by design, the function is consistent in that it combusts a waste stream for the purpose of reducing emissions; therefore, flare emission factors for NOx and CO were used to provide the most accurate emissions estimates. Although the combustor is designed to be smokeless, PM emissions have been estimated using AP-42 Table 1.4-1 factor (lb/mmscf) for a conservative estimate.

<sup>&</sup>lt;sup>2</sup> Total captured emissions are based on 100% capture efficiency from storage tanks and 70% capture efficiency from truck loading with 98% destruction efficiency from the vapor combustor based on 8,760 hours of operation per year. Uncaptured vapors reported at loading emission units. Captured emissions from sources controlled by VOC combustor shown in following tables.

<sup>3</sup> Emissions will be controlled by a VRU, but are shown as being controlled by the combutor for operational flexibility and a conservative estimate of emissions.

SWN Production Company, LLC Bonnette MSH Pad

Tanks/Loading Vapor Combustor Emissions Calculations - Criteria and Hazardous Air Pollutants (Continued)

	Captured VOC Emissions			
Source	Ib/hr TPY			
Condensate Storage Tanks	248.20	1,087.11		
Produced Water Storage Tanks	1.30	5.68		
Condensate Truck Loading	9.25	40.52		
Produced Water Truck Loading	0.08	0.38		
Total VOC =	258.83	1,133.69		

	Captured HAP Emissions (lb/hr)								
Source	n-Hexane Benzene Toluene Ethylbenzene Xylenes								
Condensate Storage Tanks	14.35	0.17	0.97	1.05	3.55				
Produced Water Storage Tanks	0.07	0.00	0.01	0.01	0.02				
Condensate Truck Loading	0.54	0.01	0.04	0.04	0.13				
Produced Water Truck Loading	<0.01	<0.01	<0.01	<0.01	<0.01				
Total HAP =	14.96	0.18	1.02	1.10	3.70				

	Captured HAP Emissions (TPY)							
Source	n-Hexane Benzene Toluene Ethylbenzene Xyler							
Condensate Storage Tanks	62.87	0.76	4.24	4.58	15.57			
Produced Water Storage Tanks	0.33	0.00	0.02	0.02	0.08			
Condensate Truck Loading	2.34	0.03	0.16	0.17	0.58			
Produced Water Truck Loading	0.02	<0.01	<0.01	<0.01	0.01			
Total HAP =	65.57	0.79	4.42	4.77	16.24			

#### SWN Production Company, LLC Bonnette MSH Pad Tanks/Loading Vapor Combustor Emissions Calculations - Greenhouse Gases

#### **Equipment Information**

Unit ID: APC-COMB

Description: Vapor Combustor

Number of Combustors: 1

Burner Design Capacity (mmBtu/hr): 15.00

Stream HHV (Btu/scf): 2,682
Annual Throughput (mmscf): 48.99
Annual Operating Hours: 8,760

#### **Greenhouse Gas (GHG) Emissions**

Pollutant	lb/hr	tonnes/yr	tons/yr
$CO_2$	1,754.66	6,972.07	7,685.39
CH <sub>4</sub>	0.03	0.13	0.14
$N_2O$	<0.01	0.01	0.01
CH₄ as CO₂e	0.83	3.28	3.62
N <sub>2</sub> O as CO <sub>2</sub> e	0.99	3.92	4.32
Total CO <sub>2</sub> + CO <sub>2</sub> e =	1,756.47	6,979.27	7,693.33

## 40 CFR 98 Tables C-1 and C-2 Emission Factors (kg/mmBtu)<sup>1</sup>

Carbon Dioxide (CO <sub>2</sub> )	53.06
Methane (CH <sub>4</sub> )	1.00E-03
Nitrous Oxide (N <sub>2</sub> O)	1.00E-04

#### Notes:

40 CFR 98 Table A-1, Global Warming Potential (GWP) multiplier:  $CO_2 = 1$ ,  $CH_4 = 25$ ,  $N_2O = 298$ 

<sup>&</sup>lt;sup>1</sup>CO<sub>2</sub>e = CO<sub>2</sub> equivalent (Pollutant times GWP multiplier):

## SWN Production Company, LLC Bonnette MSH Pad Vapor Combustor Pilot Emissions Calculations - Criteria Air Pollutants

## **Criteria Air Pollutant Emissions**

		Emission		
		Factors 1	Emissio	ns
Unit ID	Pollutant	(lb/mmscf)	lb/hr	TPY
EU-PILOT	NOx	100	0.01	0.04
APC-COMB	CO	84	<0.01	0.02
	VOC	5.5	<0.01	<0.01
	SO <sub>2</sub>	0.6	<0.01	<0.01
	PM	7.6	<0.01	<0.01

905	Pilot Stream Heat Content (Btu/SCF)
8,760	Pilot Hours/Yr
50	Pilot Gas Flow Rate (SCFH)
45,250	Total Pilot Gas Fuel Use (Btu/hr)
0.44	Total Annual Fuel Use (MMSCF)

<sup>&</sup>lt;sup>1</sup> AP-42 Table 1.4-1, -2 (7/98)

## SWN Production Company, LLC Bonnette MSH Pad Vapor Combustor Pilot Emissions Calculations - Hazardous Air Pollutants

## **Hazardous Air Pollutant Emissions**

		Emission Factors <sup>1</sup>	Emiss	sions
Unit ID	Pollutant	(lb/mmscf)	lb/hr	TPY
EU-PILOT	n-Hexane	1.8	<0.01	<0.01
APC-COMB	Formaldehyde	0.075	<0.01	<0.01
	Benzene	0.0021	<0.01	<0.01
	Toluene	0.0034	<0.01	<0.01
		Total HAPs =	<0.01	<0.01

905	Pilot Stream Heat Content (Btu/SCF)
8,760	Pilot Hours/Yr
50	Pilot Gas Flow Rate (SCFH)
45,250	Total Pilot Gas Fuel Use (Btu/hr)
0.44	Total Annual Fuel Use (MMSCF)

<sup>&</sup>lt;sup>1</sup> AP-42 Table 1.4-3 (7/98)

#### SWN Production Company, LLC Bonnette MSH Pad Vapor Combustor Pilot Emissions Calculations - Greenhouse Gases

## **Greenhouse Gas (GHG) Emissions**

		Emissions			
Unit ID	Pollutant	lb/hr	tonnes/yr	tons/yr	
EU-PILOT	$CO_2$	5.29	21.03	23.18	
APC-COMB	CH₄	<0.01	<0.01	<0.01	
	N <sub>2</sub> O	<0.01	<0.01	<0.01	
	CH₄ as CO₂e	<0.01	0.01	0.01	
	N₂O as CO₂e	<0.01	0.01	0.01	
	Total CO <sub>2</sub> + CO <sub>2</sub> e =	5.30	21.05	23.21	

905 Pilot Stream Heat Content (Btu/SCF)
8,760 Pilot Hours/Yr
50 Pilot Gas Flow Rate (SCFH)
45,250 Total Pilot Gas Fuel Use (Btu/hr)
0.44 Total Annual Fuel Use (MMSCF)

## 40 CFR 98 Tables C-1 and C-2 Emission Factors (kg/mmBtu)<sup>1</sup>

Carbon Dioxide (CO <sub>2</sub> )	53.06
Methane (CH <sub>4</sub> )	1.00E-03
Nitrous Oxide (N <sub>2</sub> O)	1.00E-04

#### Notes:

40 CFR 98 Table A-1, Global Warming Potential (GWP) multiplier: CO<sub>2</sub> = 1, CH<sub>4</sub> = 25, N<sub>2</sub>O = 298

<sup>&</sup>lt;sup>1</sup>CO<sub>2</sub>e = CO<sub>2</sub> equivalent (Pollutant times GWP multiplier):

## SWN Production Company, LLC Bonnette MSH Pad

Fugitive Emissions Calculations - Criteria and Hazardous Air Pollutants and Greenhouse Gases

#### **Equipment Information**

Source Type/Service	Number of Sources <sup>1</sup>	4		TOC lb/hr	TOC TPY	VOC Wt %	
Valves - Gas	144	9.92E-03	0.00%	1.43	6.26	24.18%	
Flanges - Gas	571	8.60E-04	0.00%	0.49	2.15	24.18%	
Compressor Seals - Gas	9	1.94E-02	0.00%	0.17	0.74	24.18%	
Relief Valves - Gas	43	1.94E-02	0.00%	0.83	3.64	24.18%	
Open-Ended Lines - Gas	0	4.41E-03	0.00%	0.00	0.00	24.18%	
		Total TOC (Gas Components) =			12.79	-	
Valves - Light Oil	106	5.51E-03	0.00%	0.58	2.54	94.29%	
Connectors - Light Oil	418	4.63E-04	0.00%	0.19	0.83	94.29%	
Pump Seals - Light Oil	0	2.87E-02	0.00%	0.00	0.00	94.29%	
Other - Light Oil	0	1.65E-02	0.00%	0.00	0.00	94.29%	
	Total TOC (Liquid Components) :						

## **VOC and Greenhouse Gas Emissions**

Source Type/Service	VOC			CH₄		CO <sub>2</sub>	
Source Type/Service	lb/hr	TPY	lb/yr	lb/hr	TPY	lb/hr	TPY
Valves - Gas	0.35	1.51	3,025.83	0.74	3.25	<0.01	0.02
Flanges - Gas	0.12	0.52	1,039.85	0.25	1.12	<0.01	0.01
Compressor Seals - Gas	0.04	0.18	369.82	0.09	0.38	<0.01	< 0.01
Relief Valves - Gas	0.20	0.88	1,766.94	0.43	1.89	<0.01	0.01
Open-Ended Lines - Gas	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Components in Gas Service =	0.71	3.09	6,202.45	1.52	6.65	0.01	0.04
Valves - Light Oil	0.55	2.41	4,825.66	0.01	0.05	<0.01	<0.01
Connectors - Light Oil	0.18	0.80	1,598.48	<0.01	0.02	<0.01	<0.01
Pump Seals - Light Oil	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other - Light Oil	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Components in Liquid Service =	0.73	3.18	6,394.80	0.01	0.06	<0.01	<0.01
Total (Gas + Liquid Components) =	1.43	6.27	12,597.25	1.53	6.71	0.01	0.04

## Hazardous Air Pollutant (HAP) Emissions (lb/hr)

Source Type/Service	n-Hexane	Benzene	Toluene	Ethylbenzene	Xylenes	2,2,4-Tri.	Total
Valves - Gas	0.01	<0.01	<0.01	<0.01	<0.01	0.00	0.01
Flanges - Gas	<0.01	<0.01	<0.01	<0.01	<0.01	0.00	<0.01
Compressor Seals - Gas	<0.01	<0.01	<0.01	<0.01	<0.01	0.00	<0.01
Relief Valves - Gas	<0.01	<0.01	<0.01	<0.01	<0.01	0.00	<0.01
Open-Ended Lines - Gas	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Components in Gas Service =	0.01	<0.01	<0.01	<0.01	<0.01	0.00	0.01
Valves - Light Oil	0.03	<0.01	<0.01	<0.01	0.01	0.00	0.05
Connectors - Light Oil	0.01	<0.01	<0.01	<0.01	<0.01	0.00	0.02
Pump Seals - Light Oil	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other - Light Oil	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Components in Liquid Service =	0.04	<0.01	<0.01	<0.01	0.01	0.00	0.06
Total (Gas + Liquid Components) =	0.06	<0.01	<0.01	<0.01	0.01	0.00	0.08

## **Hazardous Air Pollutant (HAP) Emissions (TPY)**

Source Type/Service	n-Hexane	Benzene	Toluene	Ethylbenzene	Xylenes	2,2,4-Tri.	Total
Valves - Gas	0.03	<0.01	<0.01	<0.01	<0.01	0.00	0.03
Flanges - Gas	0.01	<0.01	<0.01	<0.01	<0.01	0.00	0.01
Compressor Seals - Gas	<0.01	<0.01	<0.01	<0.01	<0.01	0.00	<0.01
Relief Valves - Gas	0.02	<0.01	<0.01	<0.01	<0.01	0.00	0.02
Open-Ended Lines - Gas	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Components in Gas Service =	0.06	<0.01	<0.01	<0.01	<0.01	0.00	0.06
Valves - Light Oil	0.15	<0.01	0.01	0.01	0.04	0.00	0.21
Connectors - Light Oil	0.05	<0.01	<0.01	<0.01	0.01	0.00	0.07
Pump Seals - Light Oil	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other - Light Oil	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Components in Liquid Service =	0.20	<0.01	0.01	0.01	0.05	0.00	0.28
Total (Gas + Liquid Components) =	0.26	<0.01	0.01	0.01	0.05	0.00	0.34

## Typical Component Count per Equipment Type based on Representative Facility<sup>3</sup>

Source Type/Service	WH	GPU	HT	LPT	FGC	OT	TT-O
Valves - Gas	12	3	2	5	5	0	0
Flanges - Gas	37	15	9	24	33	3	2
Compressor Seals - Gas	0	0	0	0	3	0	0
Relief Valves - Gas	1	3	1	1	1	1	1
Open-Ended Lines - Gas	0	0	0	0	0	0	0
Valves - Light Oil	0	5	6	12	3	6	9
Connectors - Light Oil	0	20	24	48	12	24	30
Pump Seals - Light Oil	0	0	0	0	0	0	0
Other - Light Oil	0	0	0	0	0	0	0

Equipment Type	WH	GPU	HT	LPT	FGC	OT	TT-O
Number of Each Type On Pad =	8	8	2	1	3	4	1

## Speciated Gas Analysis<sup>4</sup>

Component	Molecular Weight	Mole %	Equiv. Wt. Basis	Weight %	HC Weight %	lb/hr	TPY
Hydrogen Sulfide	34.082	0.000%	0.000	0.000%	-	0.00	0.00
Carbon Dioxide	44.010	0.149%	0.066	0.295%	-	0.01	0.04
Nitrogen	28.013	0.513%	0.144	0.646%	-	0.02	0.08
Methane	16.042	71.427%	11.458	51.479%	51.968%	1.52	6.65
Ethane	30.069	17.491%	5.259	23.629%	23.853%	0.70	3.05
Propane	44.096	6.802%	2.999	13.476%	13.603%	0.40	1.74
i-Butane	58.122	0.668%	0.388	1.744%	1.761%	0.05	0.23
n-Butane	58.122	1.828%	1.062	4.773%	4.819%	0.14	0.62
i-Pentane	72.149	0.327%	0.236	1.060%	1.070%	0.03	0.14
n-Pentane	72.149	0.440%	0.317	1.426%	1.440%	0.04	0.18
n-Hexane	86.175	0.107%	0.092	0.414%	0.418%	0.01	0.05
Other Hexanes	86.175	0.135%	0.116	0.523%	0.528%	0.02	0.07
Heptanes (as n-Heptane)	100.202	0.078%	0.078	0.351%	0.354%	0.01	0.05
Benzene	78.114	0.001%	0.001	0.004%	0.004%	<0.01	< 0.01
Toluene	92.141	0.002%	0.002	0.008%	0.008%	<0.01	<0.01
Ethylbenzene	106.167	0.000%	0.000	0.001%	0.001%	<0.01	<0.01
Xylenes	106.167	0.001%	0.001	0.005%	0.005%	<0.01	<0.01
2,2,4-Trimethylpentane	114.230	0.000%	0.000	0.000%	0.000%	0.00	0.00
Octanes (as n-Octane)	114.229	0.022%	0.025	0.113%	0.114%	<0.01	0.01
Nonanes (as n-Nonane)	128.255	0.006%	0.008	0.035%	0.035%	<0.01	<0.01
Decanes (as n-Decane)	142.282	0.003%	0.004	0.019%	0.019%	<0.01	<0.01
	TOTAL =	100.00%	22.26	100.00%	100.00%	2.95	12.91
		TOTAL HC =	22.05	TOTAL VOC =	24.18%	0.70	3.10
	•		•	TOTAL HAP =	0.44%	0.01	0.06

#### Speciated Liquids Analysis<sup>4</sup>

Component	Molecular Weight	Mole %	Equiv. Wt. Basis	Weight %	HC Weight %	lb/hr	TPY
Hydrogen Sulfide	34.082	0.000%	0.000	0.000%	-	0.00	0.00
Carbon Dioxide	44.010	0.013%	0.006	0.007%	-	<0.01	<0.01
Nitrogen	28.013	0.026%	0.007	0.009%	-	<0.01	<0.01
Methane	16.042	8.861%	1.421	1.836%	1.836%	0.01	0.06
Ethane	30.069	9.965%	2.996	3.870%	3.871%	0.03	0.13
Propane	44.096	11.708%	5.163	6.668%	6.669%	0.05	0.22
i-Butane	58.122	2.480%	1.441	1.862%	1.862%	0.01	0.06
n-Butane	58.122	9.597%	5.578	7.204%	7.206%	0.06	0.24
i-Pentane	72.149	3.683%	2.657	3.432%	3.433%	0.03	0.12
n-Pentane	72.149	6.541%	4.719	6.095%	6.096%	0.05	0.21
n-Hexane	86.175	5.195%	4.477	5.782%	5.783%	0.04	0.19
Other Hexanes	86.175	5.393%	4.647	6.002%	6.003%	0.05	0.20
Heptanes (as n-Heptane)	100.202	10.008%	10.028	12.952%	12.954%	0.10	0.44
Benzene	78.114	0.069%	0.054	0.070%	0.070%	<0.01	<0.01
Toluene	92.141	0.328%	0.302	0.390%	0.390%	<0.01	0.01
Ethylbenzene	106.167	0.307%	0.326	0.421%	0.421%	<0.01	0.01
Xylenes	106.167	1.044%	1.108	1.432%	1.432%	0.01	0.05
2,2,4-Trimethylpentane	114.230	0.000%	0.000	0.000%	0.000%	0.00	0.00
Octanes (as n-Octane)	114.229	7.566%	8.643	11.162%	11.164%	0.09	0.38
Nonanes (as n-Nonane)	128.255	4.597%	5.896	7.615%	7.616%	0.06	0.26
Decanes (as n-Decane)	142.282	12.619%	17.955	23.190%	23.193%	0.18	0.78
	TOTAL =	100.00%	77.43	100.00%	100.00%	0.77	3.37
		TOTAL HC =	77.41	TOTAL VOC =	94.29%	0.73	3.18
				TOTAL HAP =	8.10%	0.06	0.27

<sup>&</sup>lt;sup>1</sup> Component counts taken by equipment type at representative facility and made site-specific according to the number of each equipment type at this site.

<sup>&</sup>lt;sup>2</sup> Emission Factor Source: EPA-453/R-95-017. TOC multiplied by pollutant content of streams (weight %) to obtain pollutant emissions.

<sup>&</sup>lt;sup>3</sup> Equipment Type Key: WH = Well Head, GPU = Gas Production Unit, HT = Heater Treater, LPT = Low-Pressure Tower, FGC = Flash Gas Compressor, OT = Oil Tank, TT-O = Tank Truck - Oil

<sup>&</sup>lt;sup>4</sup> Analyses located in Appendix A.

#### SWN Production Company, LLC Bonnette MSH Pad Fugitive Unpaved Haul Road Emissions Calculations

#### Facility Data 1

Vehicle Type	Light Vehicles (Pick-ups and Cars)	Medium Trucks (Service Trucks)	Heavy Trucks (Tanker Trucks) <sup>2</sup>
Average vehicle weight ((empty + full)/2) (tons)	2	15	23.5
Number of wheels per vehicle type (w)	4	10	18
Average number of round trips/day/vehicle type	7	4	12
Distance per round trip (miles/trip)	0.42	0.42	0.42
Vehicle miles travelled (miles/day)	2.92	1.67	5.04
Number of days operational (days/yr)	365	365	365
Vehicle miles travelled VMT (miles/yr)	1,064.58	608.33	1,841.01
Average vehicle speed S (mph)	10	10	10
Average number of round trips/hour/vehicle type	0.39	0.22	0.67
Average number of round trips/year/vehicle type	2,555	1,460	4,418
Estimated maximum number of round trips/hour/vehicle type	3	3	2
Estimated maximum number of round trips/day/vehicle type	7	4	15
Estimated maximum number of round trips/year/vehicle type	2,683	1,533	5,749

#### Formula & Calculation Inputs

E=k(s/12) <sup>a</sup> * (W/3) <sup>b</sup> * ((365-P) / 365)	Reference : A	AP-42, Section	13.2.2 (11/06), Equation 1a and 2
where:	Rate	Units	Comment
Days per year	365		
Annual average hours per day of road operations	18		
k = PM Particle Size Multiplier	4.90	lb/VMT	AP-42 Section 13.2.2 (11/06), Table 13.2.2-2 (PM)
k = PM10 Particle Size Multiplier	1.50	lb/VMT	AP-42 Section 13.2.2 (11/06), Table 13.2.2-2 (PM <sub>10</sub> )
k = PM2.5 Particle Size Multiplier	0.15	lb/VMT	AP-42 Section 13.2.2 (11/06), Table 13.2.2-2 (PM <sub>2.5</sub> )
s = Surface Material Silt Content	3.9	%	State Default Data from AP-42 Data (1999 NEI Data)
P = Number of days > 0.01 inch of rain	150	days/year	AP-42 Section 13.2.2 (11/06), Figure 13.2.2-1
a = PM Constant	0.70	unitless	AP-42 Section 13.2.2 (11/06), Table 13.2.2-2 (PM)
a = PM10 & PM2.5 Constant	0.90	unitless	AP-42 Section 13.2.2 (11/06), Table 13.2.2-2 (PM <sub>10</sub> & PM <sub>2.5</sub> )
b = PM, PM10, & PM2.5 Constant	0.45	unitless	AP-42 Section 13.2.2 (11/06), Table 13.2.2-2
Total hourly fleet vehicle miles travelled (miles/hr)	0.53	VMT/hr	
Total annual fleet vehicle miles travelled (miles/yr) <sup>3</sup>	3,513.93	VMT/yr	
Average wheels <sup>4</sup>	12		
Average vehicle weight of the fleet (W) <sup>5</sup>	15.5	tons	
Moisture Ratio	1.00	_	Estimated based on 0.2% uncontrolled surface water content assuming no watering
Control Efficiency (CF)	0.00	%	Based on Moisture Ratio and Figure 13.2.2-2 Control

Continued on Next Page

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190 Average Tanker Volume (bbl)7,980 Gallons Tanker Volume

12.11 Tanker Trucks per Day 650 Length Leased Access Road (ft) 450 Longest Pad Side (ft) 2,200 Total Round Trip Feet

1,000 bwpd 1,300 bopd

#### SWN Production Company, LLC Bonnette MSH Pad Fugitive Unpaved Haul Road Emissions Calculations

#### **Emission Calculations**

	Emission	Factors		Control	Total Veh	icle Miles	Uncont	rolled Emission	n Rates	Uncon	trolled Emissio	n Rates		
	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	Efficiency	Trav	Travelled		Travelled Total PM		Total PM <sub>10</sub>	PM <sub>2.5</sub>	Total PM	Total PM <sub>10</sub>	PM <sub>2.5</sub>
Vehicle Type	(lbs/VMT)	(lbs/VMT)	(lbs/VMT)	(%)	(VMT/hr)	(VMT/yr)	(lb/hr)	(lb/hr)	(lb/hr)	(tons/yr)	(tons/yr)	(tons/yr)		
Light Vehicles	2.75	0.67	0.07	0.00	0.16	1,064.58	0.44	0.11	0.01	1.46	0.36	0.04		
Medium Trucks	2.75	0.67	0.07	0.00	0.09	608.33	0.26	0.06	0.01	0.84	0.20	0.02		
Heavy Trucks	2.75	0.67	0.07	0.00	0.28	1,841.01	0.77	0.19	0.02	2.53	0.62	0.06		
	Total =					3,513.92	1.47	0.36	0.04	4.83	1.18	0.12		

#### Notes:

- 1) Facility vehicle data based on estimates, GP5.1 and AP-42 13.2.2-2 defaults for industrial unpaved roads
- 2) Tank trucker average vehicle weight as  $(W_{(empty)}+W_{(full)})/2 = (7 + 40)/2 = 23.7$  tons
- 3) Average vehicle miles travelled (VMT/yr) as (No. of round trip/vehicle \* No. of vehicles/type \* Roundtrip miles/trip)\* 365 days/yr \* No. of vehicle type)
- 4) Average wheels calculated as average of (No. of wheels per vehicle type \* No. of vehicle/type)
- 5) Average vehicle fleet calculated as (Average weight of vehicle type \* Percentage of each vehicle type on unpaved surface). Percentage of each vehicle type= VMT<sub>vehicle type</sub>/VMT
- 6) Minimum one-per-day average pick-up trucks and service trucks even if tanker not required every day.
- 7) Per EPA BID calculations, all emissions based on average trips. Estimated maximum hourly, daily and yearly trips provided for information only.

#### Calculation of Emission Factors (AP-42, 13.2.2)

Equation 1a:  $EF = k(s/12)^a (W/3)^b$  where k, a, and b are empirical constants and

EF = size-specific emission factor (lb/VMT)

s = surface material silt content %

W = mean vehicle weight (tons)

Equation 2:  $EF_{ext} = EF^*((365-P)/365)$  where:

EF ext = annual size-specific emission factor extrapolated for natural mitigation, lb/VMT

EF = emission factor from Equation 1a

P = number of days in a year with at least 0.01 inches of precipitation

#### **Calculation of Emissions**

 $E = EF_{ext} * VMT/yr * ((1-CF)/100) * 1 ton/2000 lbs where:$ 

E = annual emissions (tons/yr)

EF ext = annual size-specific emission factor extrapolated for natural mitigation, Ib/VMT

CF = control efficiency (%)

## ATTACHMENT U: FACILITY-WIDE EMISSION SUMMARY SHEETS

	ATTACHMENT U – FACILITY-WIDE CONTROLLED EMISSIONS SUMMARY SHEET															
List all sources of emissions in this table. Use extra pages if necessary.																
Emission Point ID #	N	O <sub>X</sub>	C	О	V	OC	S	$O_2$	PN	$M_{10}$	PN	1 <sub>2.5</sub>	C	$H_4$	GHO	G(CO <sub>2</sub> e)
Emission I one ID #	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
EP-ENG1	0.32	1.40	0.64	2.80	0.09	0.39	< 0.01	< 0.01	0.02	0.09	0.02	0.09	< 0.01	0.01	155.19	679.73
EP-ENG2	0.32	1.40	0.64	2.80	0.09	0.39	< 0.01	< 0.01	0.02	0.09	0.02	0.09	< 0.01	0.01	155.19	679.73
EP-ENG3	0.43	1.88	0.86	3.77	0.30	1.31	< 0.01	< 0.01	0.03	0.15	0.03	0.15	< 0.01	0.02	206.62	905.00
EP-GPU1 - EP-GPU8	0.88	3.84	0.72	3.12	0.05	0.24	0.01	0.02	0.07	0.29	0.07	0.29	0.02	0.08	936.78	4103.11
EP-HT1 - EP-HT2	0.12	0.52	0.10	0.44	0.01	0.02	< 0.01	< 0.01	0.01	0.04	0.01	0.04	< 0.01	0.01	117.10	512.89
EP-LOAD-COND	-	-	-	-	3.97	17.37	-	-	-	-	-	-	0.03	0.12	0.66	2.89
EP-LOAD-PW	-	-	-	-	0.04	0.16	-	-	-	-	-	-	0.38	1.65	9.40	41.19
APC-COMB	2.08	9.11	4.13	18.11	5.18	22.69	< 0.01	< 0.01	0.04	0.18	0.04	0.18	0.03	0.15	1,761.77	7,716.54
TOTAL	4.15	18.16	7.09	31.04	9.72	42.57	0.01	0.04	0.19	0.83	0.19	0.83	0.46	2.04	3,342.71	14,641.08

Annual emissions shall be based on 8,760 hours per year of operation for all emission units.

According to 45CSR14 Section 2.43.e, fugitive emissions are not included in the major source determination because it is not listed as one of the source categories in Table 1. Therefore, fugitive emissions shall not be included in the PTE above.

Note that the emissions from the APC-COMB includes uncombusted emissions from the tanks and loading operations, as well as combustor pilot emissions.

	ATTACHMENT U – FACILITY-WIDE HAP CONTROLLED EMISSIONS SUMMARY SHEET													
List all sources of emissions in this table. Use extra pages if necessary.														
Emission Point ID #	Formal	dehyde	Benzene Toluene Ethylbenzene Xylenes Hexane									Total	HAPs	
Emission I omt 1D #	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
EP-ENG1	0.02	0.09	< 0.01	0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	-	-	0.03	0.15
EP-ENG2	0.02	0.09	< 0.01	0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	-	-	0.03	0.15
EP-ENG3	0.04	0.16	< 0.01	0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	-	-	0.06	0.24
EP-GPU1 - EP-GPU8	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	-	-	-	-	0.02	0.07	0.02	0.07
EP-HT1 - EP-HT2	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	-	-	-	-	< 0.01	0.01	< 0.01	0.01
EP-LOAD-COND	-	-	< 0.01	0.01	0.02	0.07	0.02	0.07	0.06	0.25	0.23	1.01	0.32	1.41
EP-LOAD-PW	-	-	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	0.01	< 0.01	0.01
APC-COMB	APC-COMB   <0.01   <0.01   <0.01   0.02   0.02   0.09   0.02   0.10   0.07   0.32   0.30   1.31   0.42   1.84									1.84				
TOTAL	0.08	0.34	0.02	0.07	0.06	0.25	0.06	0.26	0.20	0.89	0.84	3.67	1.29	5.65

Annual emissions shall be based on 8,760 hours per year of operation for all emission units.

According to 45CSR14 Section 2.43.e, fugitive emissions are not included in the major source determination because it is not listed as one of the source categories in Table 1. Therefore, fugitive emissions shall not be included in the PTE above.

Note that the emissions from the APC-COMB includes uncombusted emissions from the tanks and loading operations, as well as combustor pilot emissions.

#### ATTACHMENT V: CLASS II LEGAL ADVERTISEMENT

Note: Affidavit of Publication will be submitted upon receipt by SWN from the publisher.

## AIR QUALITY PERMIT NOTICE Notice of Application

Notice is given that SWN Production Company, LLC has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a G70-D General Permit Registration for a natural gas production facility (Bonnette MSH Pad) located in Marshall County, West Virginia. From the intersection of CR 2 and CR 7 in New Martinsville, WV, travel east on CR 7 13.36 miles to CR 1/15 (Brock Ridge Road) and turn left onto CR 1/15. Travel 4.02 miles north on CR 1/15 to CR 89 and turn left onto CR 89.Travel 4.70 miles on CR 89 to the intersection of CR 89 and CR 4(Saint Joseph Baker Hill Road) and turn right onto CR 4. There is a church and cemetery at this intersection. The church parking lot will be on your left as you turn onto CR 4.Proceed 4.23 miles on CR 4 to the well pad entrance on the left. Bonnette is located at 39.72041, -80.71138.

The applicant estimates the potential to discharge the following Regulated Air Pollutants will be:

Nitrogen Oxides (NOx)	18.16 tons/yr
Carbon Monoxide (CO)	31.04 tons/yr
Volatile Organic Compounds (VOC)	48.84 tons/yr
Sulfur Dioxide (SO <sub>2</sub> )	0.04 tons/yr
Particulate Matter (PM)	5.66 tons/yr
Acetaldehyde	0.05 tons/yr
Acrolein	0.05 tons/yr
Benzene	0.08 tons/yr
Ethylbenzene	0.28 tons/yr
Formaldehyde	0.34 tons/yr
Methanol	0.06 tons/yr
n-Hexane	3.93 tons/yr
Toluene	0.27 tons/yr
Xylenes	0.94 tons/yr
Carbon Dioxide	14,582.07 tons/yr
Methane	8.74 tons/yr
Nitrous Oxide	0.02 tons/yr
CO <sub>2</sub> Equivalent	14,808.87 tons/yr

The change in equipment and operations is planned to begin on or about April 1, 2017. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57th Street, SE, Charleston, WV 25304, for at least 30 calendar days from the date of publication of this notice.

Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499, extension 1250, during normal business hours.

Dated this the 1st of February, 2017

By: SWN Production Company, LLC

Carla Suszkowski, P.E.

Regulatory Manager – West Virginia Division

10000 Energy Drive Spring, TX 77389