

SWN Production Company, LLC P O Box 12359 Spring, Texas 77391-2359 www.swn.com

# THOMAS PARKINSON PAD

**G70-D PERMIT MODIFICATION** 

| 0   | CHK | 03/2013 | -   | R13-3062  |                        |            |
|-----|-----|---------|---|-----------|------------------------|------------|
| 1   | CHK | 03/2016 | REM: 1 ENG  | R13-3062A |                        |            |
| 2   | SWN | 01/2018 | ADD: 6 ENG, 3 GPU, 2 SH, 6 TANKS, 1 COMB<br>REM: 1 HT, 2 LH, 1 COMB | G70-D     | AML                    | 01/09/2018 |
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| REV | BY  | DATE    | DESCRIPTION   | PERMIT    | FACILITIES<br>REVIEWED | DATE       |

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### INTRODUCTION

SWN Production Company, LLC (SWN), operates the Thomas Parkinson Pad under Permit No. R13-3062A, issued on March 29, 2016. With this application, SWN requests authorization to add three 145-hp Caterpillar G3306 NA compressor engines, two 203-hp Caterpillar G3306 TA compressor engines, one 92-hp GM Vortec 5.7L NA compressor engine, three GPU burners, two stabilizer heaters, six tanks, and one 24-mmBtu/hr vapor combustor with pilots and to remove one heater treater, two line heaters, and one 15-mmBtu/hr vapor combustor with pilot. Combustor controls have also been removed from the produced water loading. Tank throughputs and compositions have been updated and fugitive emissions have been revised to include five sand separators and three fuel gas separators. As a result of these changes, truck loading, vapor combustor, fugitive, and haul road emissions have also been updated. The change in emissions from this project are more than the construction levels; therefore, this project qualifies as a Modification. SWN also requests to operate under the General Permit G70-D for Oil and Natural Gas Production Facilities. Equipment to be authorized includes the following:

- Three (3) Caterpillar G3306 NA Compressor Engines
- Two (2) Caterpillar G3306 TA Compressor Engines
- One (1) GM Vortec 5.7L NA Compressor Engine
- Five (5) Sand Separators (not an emissions source other than fugitive components)
- Three (3) Fuel Gas Separators (not an emissions source other than fugitive components)
- Five (5) 1.0-mmBtu/hr Gas Production Units
- Two (2) 1.5-mmBtu/hr Stabilizer Heaters
- Six (6) 400-bbl Condensate Tanks
- Six (6) 400-bbl Produced Water Tanks
- Condensate Truck Loading
- Produced Water Truck Loading
- One (1) 24.0-mmBtu/hr Vapor Combustor with Pilots
- Fugitive Emissions
- Fugitive Haul Road Emissions

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 facility 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 and GM engines were calculated with manufacturer data when available and AP-42/EPA emissions factors for the remaining pollutants.

Condensate and produced water tank emissions were calculated using ProMax process simulation software. Condensate and produced water tank emissions are routed to a vapor combustor with 100% capture efficiency and 98% destruction efficiency. Loading emissions were calculated using ProMax process simulation software and AP-42 calculations. Condensate loading emissions are routed to a vapor combustor with 70% capture efficiency and 98% destruction efficiency and 98% destruction efficiency. Produced water loading emissions are vented to the atmosphere.

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 AP-42 and EPA emission factor references, gas and liquids analyses, and process simulation results are attached.

### **Regulatory Discussion**

### <u>STATE</u>

# 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. The change in emissions from this project are more than the construction levels; therefore, this project qualifies as a Modification.

### 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 (m<sup>3</sup>) 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 m<sup>3</sup> (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 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. Although final selection of the engines has not yet been made, it is presumed that the 145-hp and 203-hp engines were manufactured after January 1, 2011 and are therefore subject to the Stage 2 emission limitations under this Subpart. SWN will comply with all applicable requirements.

# 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.

The two (2) existing wells at this location were completed during the effective date of this Subpart and are subject to the compliance requirements. There is no centrifugal compressor using wet gas seals at this facility. The pneumatic controllers utilized at the facility are considered low-bleed and are not subject to this Subpart. The storage vessel venting is controlled to less than six (6) TPY VOC and federally enforceable limits are requested; therefore, the storage vessels are not subject to 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.

The three (3) proposed wells at this location will be completed after the effective date of this Subpart and will be subject to the compliance requirements. There is no centrifugal compressor using wet gas seals at this facility. The pneumatic controllers utilized at the facility are considered low-bleed and are not subject to this Subpart. The storage vessels were constructed before the effective date of this Subpart and are not subject to this Subpart. Reciprocating compressors located at well sites are not subject to 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 proposed four-stroke, rich-burn natural gas-fired flash gas compressor engines are considered new engines and will meet the requirements of this Subpart by complying with requirements under NSPS Subpart JJJJ.

### APPLICATION FOR GENERAL PERMIT REGISTRATION

| dep  | west virginia  | department of   | environmental protection   | Division of Air Quality<br>601 57 <sup>th</sup> Street SE<br>Charleston, WV 25 4<br>Phone (304) 926-0475<br>Fax (304) 926-0479<br>www.dep.wv.gov   |
|--|--|---|--|--|
| G70-D GE   | NERAL PE   | RMIT RI   | EGISTRATION A  | -l- management   |
|  | RELOCATION, A  | DMINISTRATI   | N REGARD TO THE CONSTRU-<br>VE UPDATE AND OPERATION<br>LITIES LOCATED AT THE W   | N OF   |
| □CONSTRU<br>⊠MODIFIC.<br>□RELOCAT  | ATION  |   | □CLASS I ADMINISTRATIV<br>□CLASS II ADMINISTRATI   |  |
|  | SEC  | CTION 1. GENE   | RAL INFORMATION  |  |
| Name of Applicant (as  | registered with the W  | /V Secretary of S   | tate's Office): SWN Productio  | on Company, LLC  |
| Federal Employer ID N  | No. (FEIN): 26-4388  | 727   |  | *  |
| Applicant's Mailing A  | ddress: 10000 Energ  | gy Drive  |  |  |
| City: Spring   |  | State: TX   |  | ZIP Code: 77389  |
| Facility Name: Thoma   | ıs Parkinson Pad   |   |  |  |
| Operating Site Physica<br>If none available, list r  |  |   |  |  |
| City: Wellsburg  |  | Zip Code: 2607  | 0  | County: Brooke   |
| Latitude & Longitude<br>Latitude: 40.21907<br>Longitude: -80.56471   |  | Decimal Degree  | s to 5 digits):  |  |
| SIC Code: 1311<br>NAICS Code: 211111   |  |   | DAQ Facility ID No. (For exis<br>009-00122   | sting facilities)  |
| NAICS Code. 211111   | C.   | FRTIFICATION  | OF INFORMATION   |  |
| Official is a President<br>Directors, or Owner, d<br>authority to binu<br>Proprietorship. Re<br>compliance certifi<br>Representative. If a bu<br>off and the approp<br><b>unsigned G70-D Regis</b> | , Vice President, Secr<br>epending on business<br>d the Corporation, Par<br>quired records of dail<br>cations and all requir<br>siness wishes to certi-<br>riate names and signa<br>stration Application | etary, Treasurer,<br>structure. A busi<br>tnership, Limitec<br>y throughput, hou<br>ed notifications r<br>fy an Authorized<br>tures entered. An<br>will be returned | I be signed below by a Responsib<br>General Partner, General Manag<br>ness may certify an Authorized I<br>d Liability Company, Association<br>urs of operation and maintenance<br>nust be signed by a Responsible<br>Representative, the official agre<br>ny administratively incomplete<br>to the applicant. Furthermore<br>e applicant. No substitution of | ger, a member of the Board of<br>Representative who shall have<br>a, Joint Venture or Sole<br>, general correspondence,<br>Official or an Authorized<br>ement below shall be checked<br>or improperly signed or<br>e, if the G70-D forms are not |
| business (e.g., Corpora  | tion, Partnership, Lin<br>ly bind the business. 1  | nited Liability Co<br>If the business ch  | tative and in that capacity shall 1<br>mpany, Association Joint Ventu<br>anges its Authorized Representa<br>diately.   | re or Sole Proprietorship) and   |
|  | ereto is, to the best of   | `my knowledge, '  | General Permit Registration App<br>true, accurate and complete, and<br>ion possible.   |  |
| Responsible Official Signature:<br>Name and Title: Phone:<br>Email: Date:  |  |   | Fax:   | :  |
| If applicable:<br>Authorized Representa<br>Name and Title: Clay<br>Email: Clay_Murral@   | Murral, Regulatory   |   | Phone: 304-884-1715 Fa   | ax:  |
| If applicable:<br>Environmental Contact<br>Name and Title: Heath<br>Email: Heather Creac   | ier Cready, Regulat  | ory Technician  |  | Fax:   |

| OPERATING SIT   | E INFORMATION   |  |  |  |  |
|---|---|--|--|--|--|
| Briefly describe the proposed new operation and/or any change(s) to the facility: This application includes three (3)<br>Caterpillar G3306 NA engines (EU-ENG1 – EU-ENG3), two (2) Caterpillar G3306 TA engines (EU-ENG4 –<br>EU-ENG5), one (1) 92-hp GM Vortec 5.7L NA engine (EU-ENG6), five (5) 1.0-mmBtu/hr natural gas-fired<br>gas production unit (GPU) burners (EU-GPU1 – EU-GPU5), two (2) 1.5-mmBtu/hr natural gas-fired stabilizer<br>heaters (EU-SH1 – EU-SH2), six (6) 400-bbl condensate tanks (EU-TANKS-COND), six (6) 400-bbl produced<br>water tanks (EU-TANKS-PW), condensate and produced water truck loading (EU-LOAD-COND and EU-<br>LOAD-PW), one (1) 24.0-mmBtu/hr vapor combustor (APC-COMB) with four (4) 50-SCFH pilots (EU-<br>PILOTS), fugitive emissions (EU-FUG), and fugitive haul road emissions (EU-HR). |   |  |  |  |  |
| and turn left on CR-45. Travel 1.1 mile on CR-45 to intersect<br>on CR-45. Travel 0.8 miles on CR-45 to intersection of CR-4<br>37. Travel 1.8 miles to intersection of CR-37 and CR-7/3, (Ha<br>miles to intersection of CR-7/3 and CR-55, (again Harvey Rd  | o intersection of US 40 east and CR-45, (Atkinson Crossing),<br>ion of CR-45 and CR-47, (Potomac Ridge Rd), and turn left<br>5 and CR-37, (GC&P Rd), and stay straight through on CR-<br>arvey Rd), and turn right on CR-7/3. Travel CR-7/3 for 0.3<br>), and turn right on CR-55. Travel CR-55 for 1.9 miles to<br>th. Travel SR-88 North 3.1 miles to intersection of SR-88 and |  |  |  |  |
| ATTACHMENTS AND SU  | PPORTING DOCUMENTS  |  |  |  |  |
| I have enclosed the following required documen  | ts:   |  |  |  |  |
| Check payable to WVDEP – Division of Air Quality with the<br>⊠ Check attached to front of application.<br>□ I wish to pay by electronic transfer. Contact for payment (<br>□ I wish to pay by credit card. Contact for payment (incl. na  | incl. name and email address):  |  |  |  |  |
| <ul> <li>S500 (Construction, Modification, and Relocation)</li> <li>S1,000 NSPS fee for 40 CFR60, Subpart IIII, JJJJ, OOOO a</li> <li>S2,500 NESHAP fee for 40 CFR63, Subpart ZZZZ and/or H</li> </ul>  |   |  |  |  |  |
| <sup>1</sup> Only one NSPS fee will apply.<br><sup>2</sup> Only one NESHAP fee will apply. The Subpart ZZZZ NESH<br>requirements by complying with NSPS, Subparts IIII and/or J<br>NSPS and NESHAP fees apply to new construction or if the so  | JJJ.  |  |  |  |  |
| 🛛 Responsible Official or Authorized Representative Signatu   | 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   |  |  |  |  |
| In Fugitive Emissions Summary Sheet – Attachment J  |   |  |  |  |  |
| ⊠ Gas Well Affected Facility Data Sheet (if applicable) – At  | tachment K  |  |  |  |  |
| Storage Vessel(s) Data Sheet (include gas sample data, US HYSYS, etc.), etc. where applicable) – Attachment L   | EPA Tanks, simulation software (e.g. ProMax, E&P Tanks,   |  |  |  |  |
| ⊠ Natural Gas Fired Fuel Burning Unit(s) Data Sheet (GPUs, Heater Treaters, In-Line Heaters if applicable) – Attachment M   |   |  |  |  |  |
| ⊠ Internal Combustion Engine Data Sheet(s) (include manufacturer performance data sheet(s) if applicable) – Attachment N  |   |  |  |  |  |
| 🖾 Tanker Truck/Rail Car Loading Data Sheet (if applicable) – Attachment O   |   |  |  |  |  |
| $\Box$ 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  |   |  |  |  |  |
| Air Pollution Control Device/Emission Reduction Device(<br>applicable) – Attachment S   | s) Sheet(s) (include manufacturer performance data sheet(s) if  |  |  |  |  |
| Emission Calculations (please be specific and include all c   | calculation methodologies used) – Attachment T  |  |  |  |  |
| Security-wide Emission Summary Sheet(s) – Attachment U  |   |  |  |  |  |
| 🖾 Class I Legal Advertisement – Attachment V  |   |  |  |  |  |
| $\boxtimes$ 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 | <b>DETERMINATION FORM</b> |
|--|--------------|-----------------|---------------------------|
|--|--------------|-----------------|---------------------------|

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 <sup>1</sup>/<sub>4</sub> mile of each other.

Is there equipment and activities in the same industrial grouping (defined by SIC code)?

Yes  $\Box$  No  $\boxtimes$ 

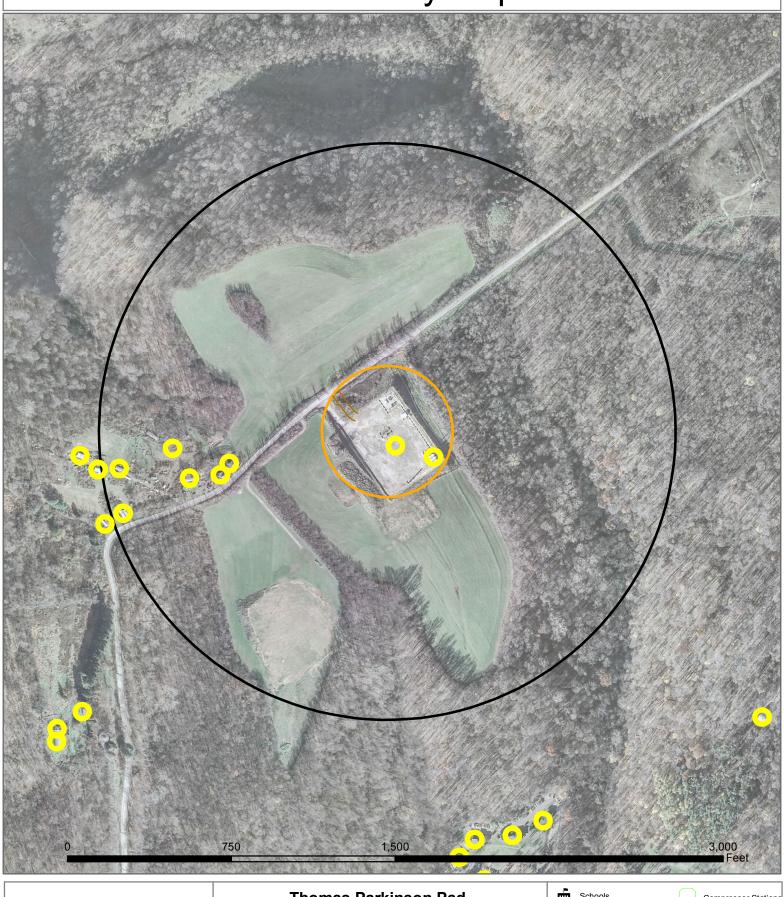
Is there equipment and activities under the control of the same person/people?

 $Yes \square No \boxtimes$ 

Is there equipment and activities located on the same site or on sites that share equipment and are within <sup>1</sup>/<sub>4</sub> mile of each other?

Yes  $\Box$  No  $\boxtimes$ 

# **Proximity Map**





### **Thomas Parkinson Pad** Lease Road: 148.58 Feet NAD83 UTM Zone 17N 537.098 4,451.465 Kilometers -80.564713 40.21290<sup>14</sup> Decimal Degrees



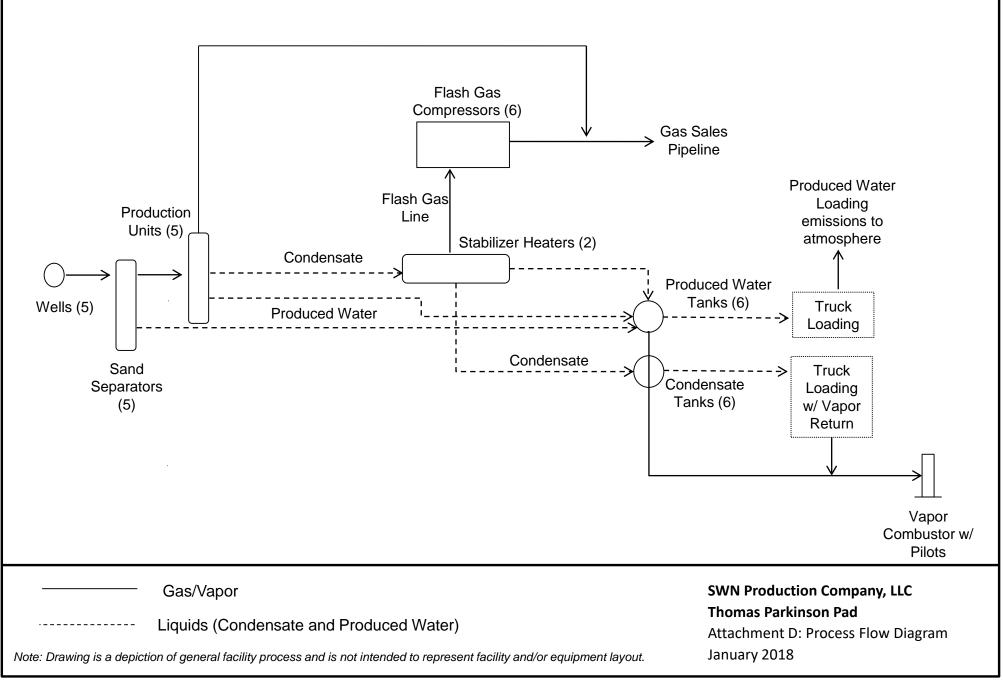
Compressor Stations Processing Plant Power Plant Hospital

•

# 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 is certificate is issued on: 12/8/2014 UNE This certificate, is issued by accordance With Chapter 11, Article 12, of the West Virginia Code in ø <u>(</u> -)|| )|51 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 registratio was granted or until it is suspended, revoked or carrcelled 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



### ATTACHMENT E: PROCESS DESCRIPTION

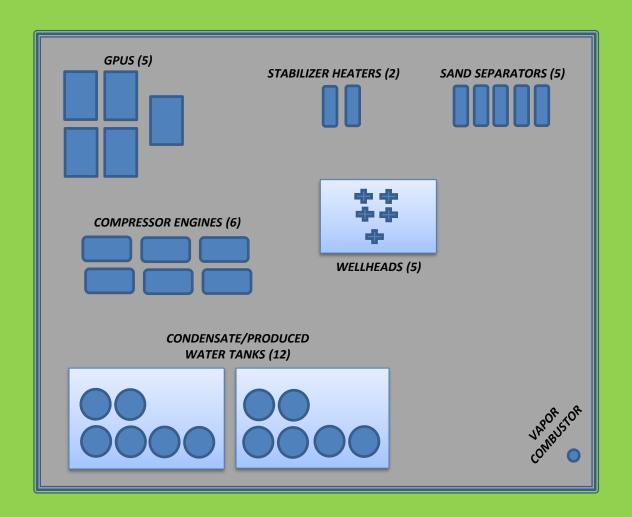
The facility is an oil and natural gas exploration and production facility, responsible for the production of condensate and natural gas. Storage of condensate and produced water also occurs on-site. A description of the facility process is as follows: Condensate, gas and water come from the wellheads through the sand separators then 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 stabilizer heaters. The flash from the stabilizer heaters is captured via natural gas-fired engine-driven flash gas compressors. Produced water from the stabilizer heaters flows into the produced water storage tanks. Condensate flows into the condensate storage tanks.

The natural gas stream exits the facility for transmission via pipeline. Condensate and produced water are transported offsite via truck. Working, breathing and flashing vapors from the condensate and produced water tanks are routed to the vapor combustor with 100% capture efficiency to be burned with at least 98% combustion efficiency. Condensate loading emissions are routed to a vapor combustor with 70% capture efficiency and 98% destruction efficiency. Produced water loading emissions are vented to the atmosphere. The vapor combustor has four (4) natural gas-fired pilots to ensure a constant flame for combustion.

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

# ATTACHMENT F: PLOT PLAN

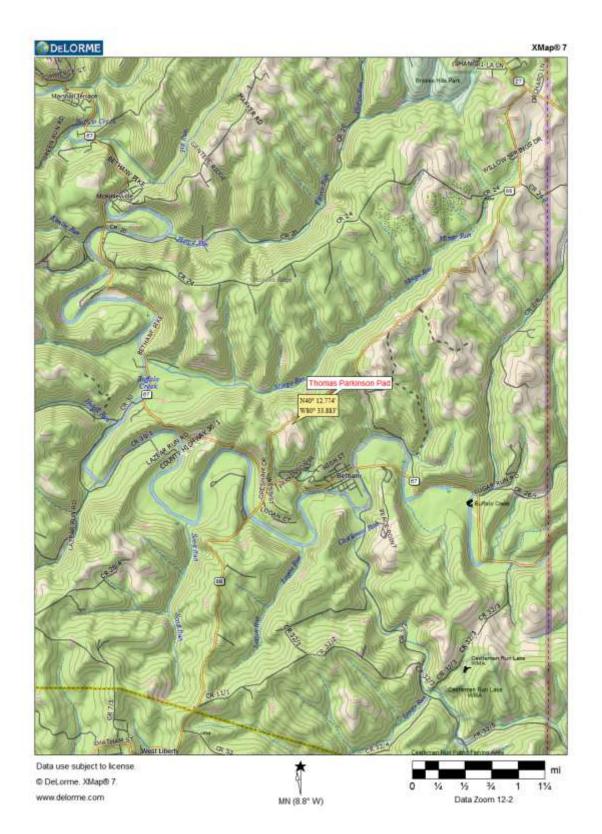
Please note that the simple plot plan provided is only a representation of production/emissions equipment to be installed. Actual location specifications and equipment placement are not to scale.



<u>NOTE</u>: Image is only a representation of production/emissions equipment. Actual location specifications and equipment placement are not to scale.

SWN Production Company, LLC Thomas Parkinson Pad Attachment F: Simple Plot Plan January 2018

# ATTACHMENT G: AREA MAPS



SWN Production Company, LLC Thomas Parkinson Pad Attachment G: Area Map January 2018



SWN Production Company, LLC Thomas Parkinson Pad Attachment G: Area Map with 300' Radius January 2018

### 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 PERMIT G70-D APPLICABLE SECTIONS |  |  |  |  |
|--|--|--|--|--|
| ⊠Section 5.0                             | Gas and Oil Well Affected Facility (NSPS, Subpart OOOO/OOOOa)  |  |  |  |
| ⊠Section 6.0                             | Storage Vessels Containing Condensate and/or Produced Water <sup>1</sup>                                       |  |  |  |
| □Section 7.0                             | Storage Vessel Affected Facility (NSPS, Subpart OOOO/OOOOa)  |  |  |  |
| ⊠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/OOOOa)   |  |  |  |
| □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>  |  |  |  |

1 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.

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

3 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.

| Emission Unit<br>ID <sup>1</sup> | Emission Point<br>ID <sup>2</sup> | Emission Unit Description            | Year<br>Installed | Manufac. Date <sup>3</sup> | Design Capacity | Type <sup>4</sup> and Date<br>of Change | Control Device(s) <sup>5</sup> | ERD(s) <sup>6</sup> |
|----------------------------------|-----------------------------------|--------------------------------------|-------------------|----------------------------|-----------------|---|--------------------------------|---------------------|
|                                  |                                   |                                      |                   | after                      |                 |   |                                |                     |
| EU-ENG1                          | EP-ENG1                           | 145-hp Caterpillar G3306 NA Engine   | TBD               | 1/1/2011                   | 145-hp          | New                                     | NSCR                           | NSCR                |
|                                  | EP-ENG2                           | 145 hr Catomiller C2200 NA Engine    | TBD               | after<br>1/1/2011          | 145 hm          | Naw                                     | NSCR                           | NSCR                |
| EU-ENG2                          | EP-ENG2                           | 145-hp Caterpillar G3306 NA Engine   | ТВО               | after                      | 145-hp          | New                                     | NSCR                           | NSCR                |
| EU-ENG3                          | EP-ENG3                           | 145-hp Caterpillar G3306 NA Engine   | TBD               | 1/1/2011                   | 145-hp          | New                                     | NSCR                           | NSCR                |
|                                  |                                   |                                      |                   | after                      |                 |   |                                |                     |
| EU-ENG4                          | EP-ENG4                           | 203-hp Caterpillar G3306 TA Engine   | TBD               | 1/1/2011                   | 203-hp          | New                                     | NSCR                           | NSCR                |
|                                  |                                   |                                      |                   | after                      |                 |   |                                |                     |
| EU-ENG5                          | EP-ENG5                           | 203-hp Caterpillar G3306 TA Engine   | TBD               | 1/1/2011                   | 203-hp          | New                                     | NSCR                           | NSCR                |
|                                  |                                   | 02 hp CM/)(ortes 5.71 NA Engine      |                   | after                      | 02 hr           | Naw                                     | NCOD                           | NCOD                |
| EU-ENG6                          | EP-ENG6                           | 92-hp GM Vortec 5.7L NA Engine       | TBD               | 7/1/2008                   | 92-hp           | New                                     | NSCR                           | NSCR                |
| EU-GPU1                          | EP-GPU1                           | 1.0-mmBtu/hr GPU Burner              | 2013              | N/A                        | 1.0-mmBtu/hr    | U                                       | N/A                            | N/A                 |
| EU-GPU2                          | EP-GPU2                           | 1.0-mmBtu/hr GPU Burner              | 2013              | N/A                        | 1.0-mmBtu/hr    | U                                       | N/A                            | N/A                 |
| EU-GPU3                          | EP-GPU3                           | 1.0-mmBtu/hr GPU Burner              | TBD               | N/A                        | 1.0-mmBtu/hr    | New                                     | N/A                            | N/A                 |
| EU-GPU4                          | EP-GPU4                           | 1.0-mmBtu/hr GPU Burner              | TBD               | N/A                        | 1.0-mmBtu/hr    | New                                     | N/A                            | N/A                 |
| EU-GPU5                          | EP-GPU5                           | 1.0-mmBtu/hr GPU Burner              | TBD               | N/A                        | 1.0-mmBtu/hr    | New                                     | N/A                            | N/A                 |
| EU-HT1                           | EP-HT1                            | 0.5-mmBtu/hr Heater Treater          | 2013              | N/A                        | 0.5-mmBtu/hr    | Removal                                 | N/A                            | N/A                 |
| EU-LH1                           | EP-LH1                            | 1.5-mmBtu/hr Line Heater             | 2013              | N/A                        | 1.5-mmBtu/hr    |   | N/A                            | N/A                 |
| EU-LH2                           | EP-LH2                            | 1.5-mmBtu/hr Line Heater             | 2013              | N/A                        | 1.5-mmBtu/hr    |   | N/A                            | N/A                 |
| EU-SH1                           | EP-SH1                            | 1.5-mmBtu/hr Stabilizer Heater       | TBD               | N/A                        | 1.5-mmBtu/hr    | New                                     | N/A                            | N/A                 |
| EU-SH2                           | EP-SH2                            | 1.5-mmBtu/hr Stabilizer Heater       | TBD               | N/A                        | 1.5-mmBtu/hr    |   | N/A                            | N/A                 |
| EU-TANKS-                        |                                   | Six (6) 400-bbl Condensate Tanks     | 3 - 2013;         |                            |                 |   |                                |                     |
| COND                             | APC-COMB                          | Routed to Vapor Combustor            | 3 - TBD           | N/A                        | 400-bbl         | Modification                            | APC-COMB                       | APC-COMB            |
| EU-TANKS-                        |                                   | Six (6) 400-bbl Produced Water Tanks | 3 - 2013;         |                            |                 |   |                                |                     |
| PW                               | APC-COMB                          | Routed to Vapor Combustor            | 3 - TBD           | N/A                        | 400-bbl         | Modification                            | APC-COMB                       | APC-COMB            |
|                                  | EU-LOAD-                          |                                      |                   |                            |                 |   | Vapor Return                   | Vapor Returr        |
| EU-LOAD-                         | COND and                          | Condensate Truck Loading w/ Vapor    |                   |                            | 20,672,505      |   | and APC-                       | and APC-            |
|                                  |                                   | Return Routed to Combustor           | 2013              | N/A                        | gal/yr          | Modification                            | СОМВ                           | COMB                |
| EU-LOAD-<br>PW                   | EP-LOAD-<br>PW                    | Draduced Water Truck Loading         | 2012              | N1/A                       | 27,724,305      | Madification                            | NI/A                           | N/A                 |
| PVV                              |                                   | Produced Water Truck Loading         | 2013              | N/A                        | gal/yr<br>24.0- | Modification                            | IN/A                           | IN/A                |
| APC-COMB                         | APC-COMB                          | 24.0-mmBtu/hr Vapor Combustor        | TBD               | N/A                        | mmBtu/hr        | New                                     | N/A                            | N/A                 |
| EU-PILOTS                        |                                   | Vapor Combustor Pilots               | TBD               | N/A                        | 200-scfh        | New                                     | N/A                            | N/A                 |
|                                  | APC-COMB-                         |                                      |                   |                            |                 |   |                                |                     |
| TKLD                             | TKLD                              | 15.0-mmBtu/hr Vapor Combustor        | 2013              | N/A                        | 15-mmBtu/hr     | Removal                                 | N/A                            | N/A                 |
|                                  | APC-COMB-                         |                                      |                   |                            |                 |   |                                |                     |
| EU-PILOT                         | TKLD                              | Vapor Combustor Pilot                | 2013              | N/A                        | 50-scfh         | Removal                                 | N/A                            | N/A                 |
| EU-FUG                           | EP-FUG                            | Fugitive Emissions                   | 2013              | N/A                        | N/A             | Modification                            |                                | N/A                 |
| EU-HR                            | EP-HR                             | Fugitive Haul Road Emissions         | 2013              | N/A                        | N/A             | Modification                            | N/A                            | N/A                 |

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

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

<sup>3</sup> When required by rule

<sup>4</sup> New, modification, removal, existing

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

<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            |   | y include loading operations for each associated sour |                             |                         |                          | ons, etc.                       |
| S                            | ource/Equipm                                    | nent: EU-FU           | G   |   |                             |                         |                          |                                 |
|                              | eak Detectior<br>Iethod Used                    |                       | Audible, visual, and<br>factory (AVO) inspections | □ Infrared (FLIR) cameras                             | □ Other (pleas              | se describe)            |                          | ⊠ None required                 |
| Component                    | Closed  |                       | Source of   | Leak Factors  | Stream type                 |                         | Estimated Emis           | sions (tpy)                     |
| Туре                         | Vent<br>System                                  | Count                 |   | her (specify))  | (gas, liquid,<br>etc.)      | VOC                     | НАР                      | GHG (methane, CO <sub>2</sub> e |
| Pumps                        | □ Yes<br>□ No                                   |                       |   |   | □ Gas<br>□ Liquid<br>□ Both |                         |                          |                                 |
| Valves                       | □ Yes<br>⊠ No                                   | 109 – gas<br>200 – LL | EPA   |   | □ Gas<br>□ Liquid<br>⊠ Both | 1.10 – gas<br>4.61 – LL | 0.01 - gas<br>0.31 - LL  | 61.21 – gas<br>1.23 – LL        |
| Safety Relief<br>Valves      | □ Yes<br>⊠ No                                   | 65                    | EPA   |   | ⊠ Gas<br>□ Liquid<br>□ Both | 1.28                    | 0.02                     | 71.38                           |
| Open Ended<br>Lines          | □ Yes<br>□ No                                   |                       |   |   | ☐ Gas<br>☐ Liquid<br>☐ Both |                         |                          |                                 |
| Sampling<br>Connections      | □ Yes<br>□ No                                   |                       |   |   | □ Gas<br>□ Liquid<br>□ Both |                         |                          |                                 |
| Connections<br>(Not sampling | ☐ Yes<br>⊠ No                                   | 698                   | EPA   |   | □ Gas<br>⊠ Liquid<br>□ Both | 1.35                    | 0.09                     | 0.36                            |
| Compressors                  | □ Yes<br>⊠ No                                   | 18                    | ЕРА   |   | ⊠ Gas<br>□ Liquid<br>□ Both | 0.35                    | <0.01                    | 19.77                           |
| Flanges                      | □ Yes<br>⊠ No                                   | 514 – gas<br>48 – LL  | EPA   |   | □ Gas<br>□ Liquid<br>⊠ Both | 0.45 - gas<br>0.05 - LL | 0.01 - gas<br><0.01 - LL | 25.02 - gas<br>0.01 - LL        |
| Other <sup>1</sup>           | □ Yes<br>⊠ No                                   | 8                     | EPA   | □ Gas<br>⊠ Liquid<br>□ Both                           | <0.01                       | <0.01                   | <0.01                    |                                 |

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 by passes (include component):  $\rm N/A$ 

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

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

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

<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.

<sup>b</sup>These 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.

<sup>C</sup>The "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<br>Flowback | Date of<br>Well<br>Completion | Green Completion<br>and/or Combustion<br>Device | Subject to OOOO<br>or OOOOa? |
|--------------------|---------------------|-------------------------------|---|------------------------------|
| 047-009-00107 (3H) | 7/22/2013           | 7/18/2013                     | Green Completion                                | 0000                         |
| 047-009-00154 (8H) | 7/25/2013           | 7/14/2013                     | Green Completion                                | 0000                         |
| PLANNED            | TBD                 | TBD                           | Green Completion                                | OOOOa                        |
| PLANNED            | TBD                 | TBD                           | Green Completion                                | OOOOa                        |
| PLANNED            | TBD                 | TBD                           | 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

PROMAX PROCESS SIMULATION RESULTS REPRESENTATIVE GAS AND LIQUID ANALYSES

### 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

- ☑ For each stream that contributes to flashing emissions:
  - $\boxtimes$  Temperature and pressure (inlet and outlet from separator(s))
  - ⊠ Simulation-predicted composition
  - ⊠ Molecular weight
  - $\boxtimes$  Flow rate
- ⊠ Resulting flash emission factor or flashing emissions from simulation
- $\boxtimes$  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)**

| 1. Bulk Storage Area Name  | 2. Tank Name   |
|--|--|
| Condensate Storage   | Six (6) 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 – 2013; 3 - TBD  | $\boxtimes$ New construction $\square$ New stored material $\boxtimes$ Other |
| Was the tank manufactured after August 23, 2011 and on or  | □ Relocation   |
| before September 18, 2015?   |  |
| $\boxtimes$ Yes $\square$ No   |  |
| Was the tank manufactured after September 18, 2015?  |  |
| $\boxtimes$ Yes $\square$ No   |  |
|  |  |
| 7A. Description of Tank Modification ( <i>if applicable</i> ) Update quantity of tanks, composition, and throughput. |  |
| 7B. Will more than one material be stored in this tank? If so, a separate form must be completed for each material.  |  |
| $\Box$ Yes $\boxtimes$ No  |  |
| 7C. Was USEPA Tanks simulation software utilized?  |  |
| $\Box$ Yes $\boxtimes$ No  |  |
| If Yes, please provide the appropriate documentation and items 8-42 below are not required.                          |  |

| 1. Bulk Storage Area Name  | 2. Tank Name   |  |  |  |
|--|--|--|--|--|
| Produced Water Storage   | Six (6) 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 – 2013; 3 - TBD  | $\boxtimes$ New construction $\square$ New stored material $\boxtimes$ Other |  |  |  |
| Was the tank manufactured after August 23, 2011 and on or          | □ Relocation   |  |  |  |
| before September 18, 2015?   |  |  |  |  |
| $\boxtimes$ Yes $\square$ No                                       |  |  |  |  |
| Was the tank manufactured after September 18, 2015?                |  |  |  |  |
| 🛛 Yes 🗌 No   |  |  |  |  |
|  |  |  |  |  |
| 7A. Description of Tank Modification (if applicable) Update qu     | antity of tanks, composition, and throughput.                                |  |  |  |
| 7B. Will more than one material be stored in this tank? If so, a s | separate form must be completed for each material.                           |  |  |  |
| $\Box$ Yes $\boxtimes$ No  |  |  |  |  |
| 7C. Was USEPA Tanks simulation software utilized?                  |  |  |  |  |
| $\Box$ Yes $\boxtimes$ 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                   |                     |                      |                     |
|--------------------------|---------------------|----------------------|---------------------|
| <b>ID</b> # <sup>1</sup> | Status <sup>2</sup> | Content <sup>3</sup> | Volume <sup>4</sup> |
| EU-TANKS-<br>LUBEOIL     | NEW                 | Lube Oil             | 50 gal              |
| EU-TANKS-<br>LUBEOIL     | NEW                 | Lube Oil             | 50 gal              |
| EU-TANKS-<br>LUBEOIL     | NEW                 | Lube Oil             | 50 gal              |
| EU-TANKS-<br>LUBEOIL     | NEW                 | Lube Oil             | 50 gal              |
| EU-TANKS-<br>LUBEOIL     | NEW                 | Lube Oil             | 50 gal              |
| EU-TANKS-<br>METHANOL    | NEW                 | Methanol             | 50 gal              |
| EU-TANKS-<br>METHANOL    | NEW                 | Methanol             | 50 gal              |
| EU-TANKS-<br>METHANOL    | NEW                 | Methanol             | 50 gal              |
| EU-TANKS-<br>METHANOL    | NEW                 | Methanol             | 50 gal              |
| EU-TANKS-<br>METHANOL    | NEW                 | Methanol             | 50 gal              |
| EU-TANKS-<br>METHANOL    | NEW                 | Methanol             | 50 gal              |
| EU-TANKS-<br>METHANOL    | NEW                 | Methanol             | 50 gal              |
| EU-TANKS-<br>METHANOL    | NEW                 | Methanol             | 50 gal              |
| EU-TANKS-<br>METHANOL    | EXIST               | Methanol             | 50 gal              |
| EU-TANKS-<br>METHANOL    | EXIST               | Methanol             | 50 gal              |

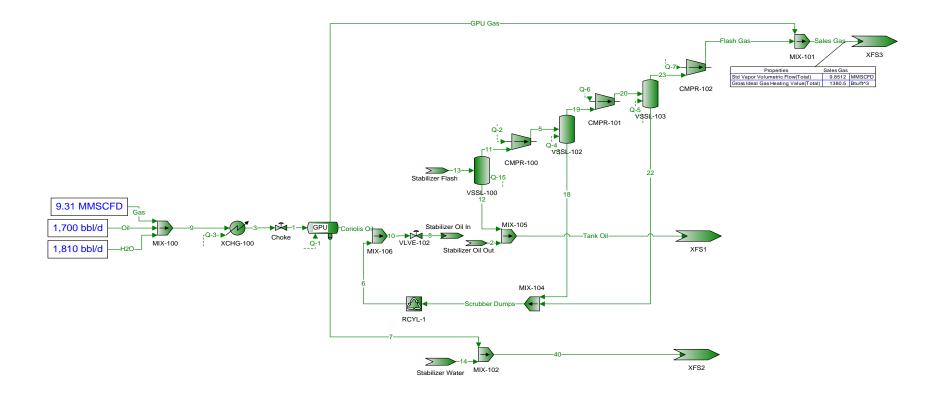
Enter the appropriate Source Identification Numbers (Source ID #) for each storage tank located at the well site. Tanks should be designated T01, T02, T03, etc. 1. 2.

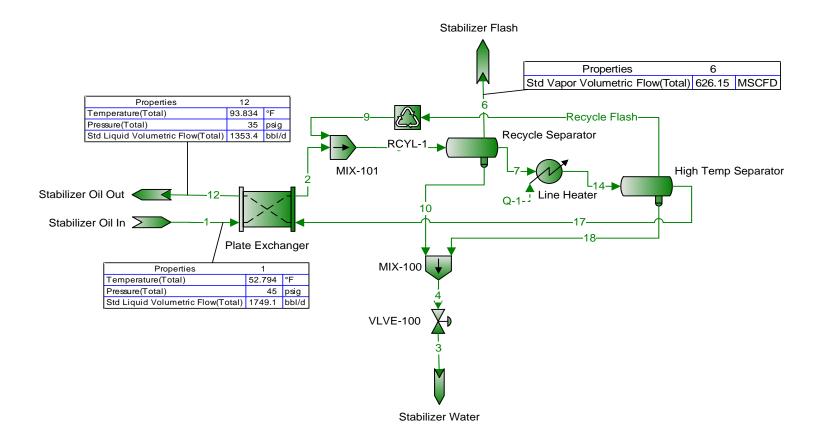
Enter storage tank Status using the following:

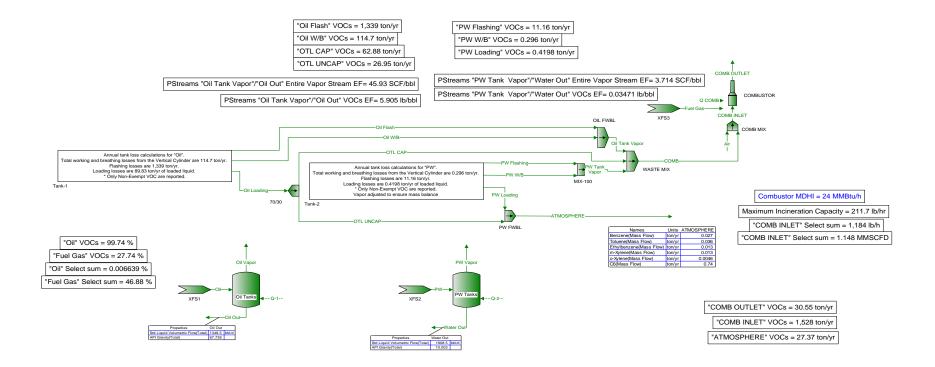
EXIST Existing Equipment NEW Installation of New Equipment

REM Equipment Removed Enter storage tank content such as condensate, pipeline liquids, glycol (DEG or TEG), lube oil, diesel, mercaptan etc. 3.

4. Enter the maximum design storage tank volume in gallons.







| Process Streams               |             | Oil Flash                    | Oil Loading             | Oil W/B                      | PW Flashing                  | PW Loading        | PW W/B                       |
|-------------------------------|-------------|------------------------------|-------------------------|------------------------------|------------------------------|-------------------|------------------------------|
| Composition                   | Status:     | Solved                       | Solved                  | Solved                       | Solved                       | Solved            | Solved                       |
| Phase: Total                  | From Block: |                              |                         |                              |                              |                   |                              |
|                               | To Block:   |                              | 70/30                   | OIL FWBL                     | MIX-100                      | PW FWBL           | MIX-100                      |
| Mass Flow                     |             | lb/h                         | <b>lb/h</b><br>0*       | lb/h                         | lb/h                         | lb/h<br>0*        | lb/h                         |
| H2S<br>N2                     |             | 0*<br>0.000597239*           | 2.45380E-06*            | 0*<br>3 13405E-06*           | 0*<br>0.0496293*             | 0.000716278*      |                              |
| CO2                           |             | 0.0459491*                   | 0.00302039*             | 0.00385772*                  | 0.373006*                    | 0.232240*         | 0.163744*                    |
| C1                            |             | 0.842762*                    | 0.0142183*              | 0.0181599*                   | 7.53025*                     | 0.223555*         | 0.157620*                    |
| C2                            |             | 22.6898*                     | 2.02795*                | 2.59016*                     | 4.77574*                     | 0.220281*         | 0.155312*                    |
| C3                            |             | 99.2029*                     | 7.14560*                | 9.12654*                     | 1.79188*                     | 0.0587872*        | 0.0414487*                   |
| iC4                           |             | 25.5814*                     | 1.70363*                | 2.17592*                     | 0.130393*                    | 0.00314589*       | 0.00221805*                  |
| nC4                           |             | 95.0709*                     | 6.36234*                | 8.12615*                     | 0.477459*                    | 0.0143295*        | 0.0101032*                   |
| 2,2-Dimethylbutane            |             | 0.0802054*                   | 0.00509098*             | 0.00650233*                  | 6.36423E-05*                 | 5.06847E-07*      | 3.57359E-07*                 |
| iC5                           |             | 21.1336*                     | 1.35319*                | 1.72833*                     | 0.0526069*                   |                   | 0.000818354*                 |
| nC5                           |             | 34.5848*                     | 2.17523*                | 2.77826*                     | 0.0317539*                   |                   | 0.000182825*                 |
| 2,2-Dimethylpropane           |             | 0.923395*                    | 0.0596698*              | 0.0762117*                   | 0.00196589*                  |                   | 2.06457E-05*                 |
| Cyclopentane                  |             | 0.0466094*                   | 0.00261854*             | 0.00334447*                  | 0.000527703*                 |                   | 4.69200E-05*                 |
| 2,3-Dimethylbutane            |             | 0.689328*                    | 0.0431695*              | 0.0551372*                   | 0.00119820*                  |                   | 1.56997E-05*                 |
| 2-Methylpentane               |             | 5.21164*                     | 0.325331*               | 0.415521*                    | 0.00578774*                  |                   | 4.77741E-05*                 |
| 3-Methylpentane               |             | 2.91510*                     | 0.181241*               | 0.231485*                    | 0.00782740*                  |                   | 0.000162574*                 |
| Methylcyclopentane            |             | 1.06135*                     | 0.0583663*              | 0.0745470*                   | 0.00465827*                  |                   | 0.000162979*                 |
| Benzene                       |             | 0.114696*                    | 0.00445420*             | 0.00568902*                  | 0.00594358*                  | 0.00480621*       | 0.00338868*                  |
| C6<br>Cycloboyono             |             | 8.84842*<br>0.972720*        | 0.563960*<br>0.0507188* | 0.720304*                    | 0.00467250*                  |                   | 1.88089E-05*<br>0.000774266* |
| Cyclohexane<br>2-Methylhexane |             | 1.50404*                     | 0.0264053*              | 0.0647794*<br>0.0337255*     | 0.00926496*<br>0.00113509*   |                   | 6.99537E-06*                 |
| 2-Methylhexane                |             | 1.50404<br>1.26420*          | 0.0264053               | 0.0337255<br>0.0984890*      | 0.00113509                   |                   | 8.57616E-06*                 |
| 2,2,4-Trimethylpentane        |             | 0*                           | 0.0771117               | 0.0984890                    | 0.00114596                   | 1.21037E-05<br>0* | 0.57010E-00                  |
| C7                            |             | 2.87616*                     | 0.170979*               | 0.218378*                    | 0.00110622*                  |                   | 3.40186E-06*                 |
| Methylcyclohexane             |             | 1.02765*                     | 0.0599522*              | 0.0765725*                   | 0.00431354*                  |                   | 0.000153618*                 |
| Toluene                       |             | 0.165567*                    | 0.00654680*             | 0.00836174*                  | 0.00778934*                  | 0.00631377*       | 0.00445161*                  |
| C8                            |             | 1.62445*                     | 0.0947764*              | 0.121051*                    | 0.000252413*                 |                   | 3.19615E-07*                 |
| Ethylbenzene                  |             | 0.0641058*                   | 0.00275135*             | 0.00351409*                  | 0.00279540*                  | 0.00222013*       | 0.00156533*                  |
| m-Xylene                      |             | 0.0607860*                   | 0.00338081*             | 0.00431806*                  | 0.00243741*                  | 0.00198100*       |                              |
| o-Xylene                      |             | 0.0223515*                   | 0.000797963*            | 0.00101918*                  | 0.00102648*                  |                   | 0.000577072*                 |
| C9                            |             | 0.391624*                    | 0.0227279*              | 0.0290287*                   | 6.17043E-05*                 |                   | 9.01375E-08*                 |
| C10                           |             | 0.117432*                    | 0.00638935*             | 0.00816064*                  | 5.18354E-06*                 | 3.05391E-09*      | 2.15320E-09*                 |
| C11                           |             | 0.0320184*                   | 0.00171092*             | 0.00218523*                  | 1.51087E-06*                 | 9.89059E-10*      | 6.97349E-10*                 |
| C12                           |             | 0.00889562*                  | 0.000448901*            | 0.000573348*                 | 1.54539E-06*                 | 4.05943E-09*      | 2.86215E-09*                 |
| C13                           |             | 0.00259707*                  | 0.000124351*            | 0.000158824*                 | 1.14235E-06*                 | 7.74142E-09*      | 5.45819E-09*                 |
| C14                           |             | 0.000770367*                 | 3.45251E-05*            | 4.40963E-05*                 | 6.72380E-07*                 | 9.47248E-09*      | 6.67869E-09*                 |
| C15                           |             | 0.000221055*                 | 9.85087E-06*            | 1.25818E-05*                 | 3.88278E-07*                 | 1.14303E-08*      | 8.05909E-09*                 |
| C16                           |             | 6.50659E-05*                 |                         | 3.04177E-06*                 | 2.88878E-07*                 |                   | 1.72131E-08*                 |
| C17                           |             | 1.97997E-05*                 |                         | 7.73073E-07*                 | 1.98431E-07*                 |                   | 3.46832E-08*                 |
| C18                           |             | 7.81279E-06*                 |                         | 2.64961E-07*                 | 1.32515E-07*                 |                   | 5.91140E-08*                 |
| C19                           |             | 2.19930E-06*                 |                         | 5.84483E-08*                 | 5.25011E-08*                 |                   | 2.37502E-08*                 |
| C20                           |             | 5.40624E-07*                 |                         | 1.67796E-08*                 | 1.48399E-08*                 |                   | 6.52746E-09*                 |
| C21                           |             | 1.47343E-07*                 |                         | 4.23246E-09*                 | 4.13166E-09*                 |                   | 1.78988E-09*                 |
| C22                           |             | 6.23911E-08*                 | 1.01135E-09*            |                              | 1.72416E-09*                 |                   | 7.25514E-10*                 |
| C23                           |             | 1.68890E-08*                 |                         | 3.23161E-10*                 | 4.47543E-10*                 |                   | 1.80835E-10*                 |
| C24                           |             | 3.04766E-09*                 |                         | 7.84612E-11*                 | 7.76654E-11*                 |                   | 3.07345E-11*                 |
| C25                           |             | 1.09493E-09*                 |                         | 2.57603E-11*                 | 2.67674E-11*                 |                   | 1.02339E-11*                 |
| C26<br>C27                    |             | 4.46314E-10*<br>4.00041E-11* |                         | 1.33497E-11*<br>1.43233E-12* | 1.03419E-11*                 |                   | 3.81815E-12*<br>3.12536E-13* |
| C27<br>C28                    |             | 4.00041E-11*<br>3.00684E-11* |                         | 1.43233E-12<br>2.80178E-13*  | 8.78263E-13*<br>6.31805E-13* |                   | 2.17777E-13*                 |
| C28<br>C29                    |             | 3.00684E-11*<br>1.25619E-11* |                         | 2.80178E-13<br>1.10766E-13*  | 2.56159E-13*                 |                   | 2.1////E-13*<br>8.74512E-14* |
| C29<br>C30                    |             | 3.60579E-11*                 |                         | 8.15354E-14*                 | 6.97204E-13*                 |                   | 8.74512E-14<br>2.29153E-13*  |
| H2O                           |             | 0.0253247*                   |                         | 6.15354E-14<br>1.18828E-06*  | 0.302788*                    | 0.231735*         | 0.163388*                    |
| Oxygen                        |             | 0.0255247                    | 9.30359E-07<br>0*       | 0*                           | 0.302788                     | 0.231735          | 0.103366<br>0*               |
| TEG                           |             | 0*                           | 0*                      | 0*                           | 0*                           | 0*                | 0*                           |
|                               | lb/hr:      | 305.60                       | 20.51                   | 26.19                        | 2.55                         | 0.10              | 0.07                         |
|                               | TPY:        | 1,338.53                     | 89.83                   | 114.73                       | 11.16                        | 0.42              | 0.30                         |

# TABLE 1-B

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

| SEPARATOR GOR: 4381 Scf/Sep Bbl |
|---------------------------------|
| SEPARATOR PRESSURE 215 psig     |
| SEPARATOR TEMPERATURE: 55 °F    |

|                        | SEPARATOR 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               | 0.496         | 0.000 | 0.015   | 0.004    | 0.405   | 0.000      |  |
| Carbon Dioxide         | 0.133         | 0.000 | 0.010   | 0.011    | 0.110   | 0.000      |  |
| Methane                | 70.754        | 0.000 | 5.084   | 0.773    | 58.285  | 0.000      |  |
| Ethane                 | 18.380        | 4.955 | 9.419   | 6.156    | 16.678  | 4.496      |  |
| Propane                | 7.198         | 1.999 | 13.438  | 9.048    | 8.383   | 2.328      |  |
| Iso-butane             | 0.590         | 0.195 | 2.701   | 2.160    | 0.991   | 0.327      |  |
| N-butane               | 1.711         | 0.544 | 11.641  | 8.969    | 3.596   | 1.143      |  |
| 2-2 Dimethylpropane    | 0.000         | 0.000 | 0.173   | 0.162    | 0.033   | 0.013      |  |
| Iso-pentane            | 0.211         | 0.078 | 3.777   | 3.376    | 0.888   | 0.327      |  |
| N-pentane              | 0.317         | 0.116 | 7.673   | 6.798    | 1.714   | 0.626      |  |
| 2-2 Dimethylbutane     | 0.003         | 0.001 | 0.087   | 0.088    | 0.019   | 0.008      |  |
| Cyclopentane           | 0.003         | 0.001 | 0.000   | 0.000    | 0.002   | 0.001      |  |
| 2-3 Dimethylbutane     | 0.005         | 0.002 | 0.246   | 0.246    | 0.051   | 0.021      |  |
| 2 Methylpentane        | 0.039         | 0.016 | 2.037   | 2.067    | 0.418   | 0.175      |  |
| 3 Methylpentane        | 0.022         | 0.009 | 1.250   | 1.248    | 0.255   | 0.105      |  |
| Other Hexanes          | 0.000         | 0.000 | 0.000   | 0.000    | 0.000   | 0.000      |  |
| n-Hexane               | 0.067         | 0.028 | 4.799   | 4.823    | 0.965   | 0.400      |  |
| Methylcyclopentane     | 0.005         | 0.002 | 0.578   | 0.500    | 0.114   | 0.041      |  |
| Benzene                | 0.001         | 0.000 | 0.067   | 0.046    | 0.014   | 0.004      |  |
| Cyclohexane            | 0.006         | 0.002 | 0.688   | 0.573    | 0.136   | 0.047      |  |
| 2-Methylhexane         | 0.007         | 0.003 | 1.483   | 1.685    | 0.287   | 0.135      |  |
| 3-Methylhexane         | 0.007         | 0.003 | 1.361   | 1.527    | 0.264   | 0.122      |  |
| 2,2,4 Trimethylpentane | 0.000         | 0.000 | 0.000   | 0.000    | 0.000   | 0.000      |  |
| Other Heptanes         | 0.007         | 0.003 | 0.628   | 0.680    | 0.125   | 0.056      |  |
| n-Heptane              | 0.014         | 0.007 | 3.405   | 3.839    | 0.658   | 0.306      |  |
| Methylcyclohexane      | 0.006         | 0.002 | 1.433   | 1.408    | 0.277   | 0.112      |  |
| Toluene                | 0.001         | 0.000 | 0.271   | 0.222    | 0.052   | 0.018      |  |
| Other C-8's            | 0.008         | 0.004 | 4.169   | 4.862    | 0.798   | 0.384      |  |
| n-Octane               | 0.003         | 0.002 | 2.165   | 2.710    | 0.413   | 0.214      |  |
| Ethylbenzene           | 0.000         | 0.000 | 0.283   | 0.267    | 0.054   | 0.021      |  |
| M&P-Xylene             | 0.001         | 0.000 | 0.288   | 0.273    | 0.055   | 0.022      |  |
| O-Xylene               | 0.000         | 0.000 | 0.123   | 0.114    | 0.023   | 0.009      |  |
| Other C-9's            | 0.002         | 0.001 | 2.999   | 3.907    | 0.571   | 0.307      |  |
| n-Nonane               | 0.001         | 0.001 | 1.367   | 1.880    | 0.260   | 0.148      |  |
| Other C10's            | 0.000         | 0.000 | 2.719   | 3.893    | 0.516   | 0.305      |  |
| n-Decane               | 0.000         | 0.000 | 0.845   | 1.268    | 0.160   | 0.099      |  |
| Undecanes Plus         | 0.002         | 0.001 | 12.778  | 24.418   | 2.428   | 1.913      |  |
| TOTAL                  | 100.000       | 7.974 | 100.000 | 100.000  | 100.000 | 14.229     |  |

# TABLE 1-B

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

SEPARATOR GOR...... 4381 Scf/Sep Bbl SEPARATOR PRESSURE...... 215 psig SEPARATOR TEMPERATURE...... 55 °F

| UNDECANES PLUS (C <sub>11+</sub> ) FRACTION CHARACTERISTICS  |        |        |            |         |         |  |  |  |
|--|--------|--------|------------|---------|---------|--|--|--|
| Molecular         Vapor         Gross Heating Value           Specific Gravity         Weight         Volume |        |        |            |         |         |  |  |  |
| COMPONENT  | °API   | **     | lb/lb-mole | Scf/Gal | ***     |  |  |  |
| Gas  | N/A    | 0.8250 | 156.000    | 16.558  | 8,400   |  |  |  |
| Oil  | 41.949 | 0.8158 | 201.300    | 12.689  | 130,622 |  |  |  |
| Wellstream   | N/A    | 0.8158 | 201.270    | 12.691  | N/A     |  |  |  |

| TOTAL SAMPLE CHARACTERISTICS |                  |        |            |         |           |             |  |  |
|------------------------------|------------------|--------|------------|---------|-----------|-------------|--|--|
|                              |                  |        | Molecular  | Vapor   | Gross Hea | ating Value |  |  |
|                              | Specific Gravity |        | Weight     | Volume  | Dry       | Saturated   |  |  |
| COMPONENT                    | °API             | **     | lb/lb-mole | Scf/Gal | ***       | ***         |  |  |
| Gas                          | N/A              | 0.7683 | 22.159     | 125.402 | 1,348     | 1,325       |  |  |
| Oil                          | 77.724           | 0.6763 | 87.330     | 24.247  | N/A       | 114,325     |  |  |
| Wellstream                   | N/A              | 1.1924 | 34.534     | 55.616  | N/A       | N/A         |  |  |

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

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

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

## 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<br>Unit ID# <sup>1</sup> | Emission<br>Point ID# <sup>2</sup> | Emission Unit Description<br>(manufacturer, model #) | Year<br>Installed/<br>Modified | Type <sup>3</sup> and Date of<br>Change | Maximum<br>Design Heat<br>Input<br>(MMBTU/hr) <sup>4</sup> | Fuel<br>Heating<br>Value<br>(BTU/scf) <sup>5</sup> |
|-----------------------------------|------------------------------------|--|--------------------------------|---|--|--|
| EU-GPU1                           | EP-GPU1                            | Gas Production Unit Burner                           | 2013                           | EXIST                                   | 1.0  | 905  |
| EU-GPU2                           | EP-GPU2                            | Gas Production Unit Burner                           | 2013                           | EXIST                                   | 1.0  | 905  |
| EU-GPU3                           | EP-GPU3                            | Gas Production Unit Burner                           | TBD                            | NEW                                     | 1.0  | 905  |
| EU-GPU4                           | EP-GPU4                            | Gas Production Unit Burner                           | TBD                            | NEW                                     | 1.0  | 905  |
| EU-GPU5                           | EP-GPU5                            | Gas Production Unit Burner                           | TBD                            | NEW                                     | 1.0  | 905  |
| EU-SH1                            | EP-SH1                             | Stabilizer Heater                                    | TBD                            | NEW                                     | 1.5  | 905  |
| EU-SH2                            | EP-SH2                             | Stabilizer Heater                                    | TBD                            | NEW                                     | 1.5  | 905  |
|                                   |                                    |  |                                |   |  |  |
|                                   |                                    |  |                                |   |  |  |
|                                   |                                    |  |                                |   |  |  |
|                                   |                                    |  |                                |   |  |  |
|                                   |                                    |  |                                |   |  |  |
|                                   |                                    |  |                                |   |  |  |
|                                   |                                    |  |                                |   |  |  |
|                                   |                                    |  |                                |   |  |  |

<sup>1</sup> 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.

- <sup>2</sup> 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.
- <sup>3</sup> New, modification, removal
- <sup>4</sup> Enter design heat input capacity in MMBtu/hr.
- <sup>5</sup> Enter the fuel heating value in BTU/standard cubic foot.

|   | N   | O <sub>x</sub> <sup>b</sup>  | C   | 0                            |
|---|---|------------------------------|---|------------------------------|
| Combustor Type<br>(MMBtu/hr Heat Input)<br>[SCC]                                | Emission Factor<br>(lb/10 <sup>6</sup> scf) | Emission<br>Factor<br>Rating | Emission Factor<br>(lb/10 <sup>6</sup> scf) | Emission<br>Factor<br>Rating |
| Large Wall-Fired Boilers<br>(>100)<br>[1-01-006-01, 1-02-006-01, 1-03-006-01]   |   |                              |   |                              |
| Uncontrolled (Pre-NSPS) <sup>c</sup>  | 280   | А                            | 84  | В                            |
| Uncontrolled (Post-NSPS) <sup>c</sup>   | 190   | А                            | 84  | В                            |
| Controlled - Low NO <sub>x</sub> burners  | 140   | А                            | 84  | В                            |
| Controlled - Flue gas recirculation   | 100   | D                            | 84  | В                            |
| Small Boilers<br>(<100)<br>[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  | С                            | 84  | В                            |
| Tangential-Fired Boilers<br>(All Sizes)<br>[1-01-006-04]                        |   |                              |   |                              |
| Uncontrolled  | 170   | А                            | 24  | С                            |
| Controlled - Flue gas recirculation   | 76  | D                            | 98  | D                            |
| Residential Furnaces<br>(<0.3)<br>[No SCC]                                      |   |                              |   |                              |
| Uncontrolled  | 94  | В                            | 40  | В                            |

# Table 1.4-1. EMISSION FACTORS FOR NITROGEN OXIDES (NOx) AND CARBON MONOXIDE (CO)FROM NATURAL GAS COMBUSTIONa

Reference 11. Units are in pounds of pollutant per million standard cubic feet of natural gas fired. To convert from  $lb/10^{6}$  scf to  $kg/10^{6}$  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  $lb/10^{6}$  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.

<sup>b</sup> 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 x emission factor. For tangential-fired boilers with SNCR control, apply a 13 percent reduction to the appropriate NO x emission factor.
 <sup>c</sup> 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

<sup>c</sup> 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.

1.4-5

| CAS No.    | Pollutant                                     | Emission Factor<br>(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                                    | Е                      |
|            | 7,12-Dimethylbenz(a)anthracene <sup>b,c</sup> | <1.6E-05                                    | Е                      |
| 83-32-9    | Acenaphthene <sup>b,c</sup>                   | <1.8E-06                                    | Е                      |
| 203-96-8   | Acenaphthylene <sup>b,c</sup>                 | <1.8E-06                                    | Е                      |
| 120-12-7   | Anthracene <sup>b,c</sup>                     | <2.4E-06                                    | Е                      |
| 56-55-3    | Benz(a)anthracene <sup>b,c</sup>              | <1.8E-06                                    | Е                      |
| 71-43-2    | Benzene <sup>b</sup>                          | 2.1E-03                                     | В                      |
| 50-32-8    | Benzo(a)pyrene <sup>b,c</sup>                 | <1.2E-06                                    | Е                      |
| 205-99-2   | Benzo(b)fluoranthene <sup>b,c</sup>           | <1.8E-06                                    | Е                      |
| 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                                     | Е                      |
| 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                                     | Е                      |
| 109-66-0   | Pentane                                       | 2.6E+00                                     | Е                      |
| 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<sup>a</sup>

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

| CAS No.  | Pollutant              | Emission Factor<br>(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                                     | Е                      |
| 108-88-3 | Toluene <sup>b</sup>   | 3.4E-03                                     | С                      |

<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> m<sup>3</sup>, multiply by 16. To convert from 1b/10<sup>6</sup> scf to lb/MMBtu, divide by 1,020. Emission Factors preceeded with a less-than symbol are based on method detection limits.

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

<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>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-E   | ENG1                               | EU-I  | ENG2  | EU-I   | ENG3                         |  |
|---|----------------------------|--|------------------------------------|---|---|--|------------------------------|--|
| Engine Manufac  | turer/Model                | Caterpillar  | G3306 NA                           | Caterpillar   | G3306 NA                                      | Caterpillar G3306 NA   |                              |  |
| Manufacturers H   | Rated bhp/rpm              | 145-hp/1,800-rpm   |                                    | 145-hp/1  | ,800-rpm                                      | 145-hp/1,800-rpm   |                              |  |
| Source Status <sup>2</sup>  |                            | N  | S                                  | N   | IS  | N  | IS                           |  |
| Date Installed/<br>Modified/Remo  | ved/Relocated <sup>3</sup> | TI   | BD                                 | T   | BD  | TI   | BD                           |  |
| Engine Manufac<br>/Reconstruction   |                            | After 1  | /1/2011                            | After 1   | /1/2011                                       | After 1  | /1/2011                      |  |
| Check all applicable Federal<br>Rules for the engine (include<br>EPA Certificate of Conformity<br>if applicable) <sup>5</sup> |                            | <ul> <li>⋈40CFR60 Subpart JJJJ</li> <li>□JJJJ Certified?</li> <li>□40CFR60 Subpart IIII</li> <li>□IIII Certified?</li> <li>⋈40CFR63 Subpart ZZZZ</li> <li>□ NESHAP ZZZZ/ NSPS</li> <li>JJJJ Window</li> <li>□ NESHAP ZZZZ Remote</li> <li>Sources</li> </ul> |                                    | <ul> <li>⋈ 40CFR60 Subpart JJJJ</li> <li>□ JJJJ Certified?</li> <li>□ 40CFR60 Subpart IIII</li> <li>□ IIII Certified?</li> <li>⋈ 40CFR63 Subpart ZZZZ</li> <li>□ NESHAP ZZZZ/ NSPS</li> <li>JJJJ Window</li> <li>□ NESHAP ZZZZ Remote</li> <li>Sources</li> </ul> |   | <ul> <li>☑ 40CFR60 Subpart JJJJ</li> <li>□ JJJJ Certified?</li> <li>□ 40CFR60 Subpart IIII</li> <li>□ IIII Certified?</li> <li>☑ 40CFR63 Subpart ZZZZ</li> <li>□ NESHAP ZZZZ/ NSPS</li> <li>JJJJ Window</li> <li>□ NESHAP ZZZZ Remote Sources</li> </ul> |                              |  |
| Engine Type <sup>6</sup>  |                            | 4SRB   |                                    | 48  | 4SRB  |  | RB                           |  |
| APCD Type <sup>7</sup>  |                            | NSCR   |                                    | NS  | CR  | NSCR   |                              |  |
| Fuel Type <sup>8</sup>  |                            | Р  | PQ                                 |   | PQ  |  | PQ                           |  |
| H <sub>2</sub> S (gr/100 scf)   |                            | Negli  | gible                              | Negligible  |   | Negligible   |                              |  |
| Operating bhp/rpm   |                            | 145-hp/1   | ,800-rpm                           | 145-hp/1,800-rpm  |   | 145-hp/1,800-rpm   |                              |  |
| BSFC (BTU/bhj   | p-hr)                      | 8,6  | 8,625                              |   | 8,625   |  | 525                          |  |
| Hourly Fuel Th  | oughput                    | 1,382 ft <sup>3</sup> /hr<br>gal/hr  |                                    | 1,382 ft <sup>3</sup> /hr<br>gal/hr   |   | 1,382 ft <sup>3</sup> /hr<br>gal/hr  |                              |  |
| Annual Fuel Th<br>(Must use 8,760<br>emergency gene   | hrs/yr unless              | 12.11 MMft <sup>3</sup> /yr<br>gal/yr  |                                    | 12.11 MMft <sup>3</sup> /yr<br>gal/yr   |   | 12.11 MMft <sup>3</sup> /yr<br>gal/yr  |                              |  |
| Fuel Usage or H<br>Operation Meter  |                            | Yes 🗆  | No 🛛                               | Yes 🗆 No 🖂  |   | Yes 🗆 No 🖾   |                              |  |
| Calculation<br>Methodology <sup>9</sup>   | Pollutant <sup>10</sup>    | Hourly<br>PTE<br>(lb/hr) <sup>11</sup>   | Annual<br>PTE<br>(tons/year)<br>11 | Hourly<br>PTE<br>(lb/hr) <sup>11</sup>  | Annual<br>PTE<br>(tons/year)<br><sup>11</sup> | Hourly<br>PTE<br>(lb/hr) <sup>11</sup>   | Annual<br>PTE<br>(tons/year) |  |
| MD  | NO <sub>x</sub>            | 0.32   | 1.40                               | 0.32  | 1.40  | 0.32   | 1.40                         |  |
| MD  | СО                         | 0.64   | 2.80                               | 0.64  | 2.80  | 0.64   | 2.80                         |  |
| MD  | VOC                        | 0.16   | 0.69                               | 0.16  | 0.69  | 0.16   | 0.69                         |  |
| AP  | SO <sub>2</sub>            | < 0.01   | < 0.01                             | < 0.01  | < 0.01  | < 0.01   | < 0.01                       |  |
| AP  | PM <sub>10</sub>           | 0.01   | 0.05                               | 0.01  | 0.05  | 0.01   | 0.05                         |  |
| MD  | Formaldehyde               | 0.09   | 0.38                               | 0.09  | 0.38  | 0.09   | 0.38                         |  |
| AP  | Total HAPs                 | 0.10   | 0.44                               | 0.10  | 0.44  | 0.10   | 0.44                         |  |
| MD and EPA  | GHG (CO <sub>2</sub> e)    | 155.19   | 679.73                             | 155.19  | 679.73  | 155.19   | 679.73                       |  |

### 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-E  | ENG4                               | EU-ENG5   |   | EU-ENG6  |                              |
|---|----------------------------|---|------------------------------------|---|---|--|------------------------------|
| Engine Manufac  | cturer/Model               | Caterpillar   | G3306 TA                           | Caterpillar G3306 TA  |   | GM Vortec 5.7L NA  |                              |
| Manufacturers <b>F</b>  | Rated bhp/rpm              | 203-hp/1  | ,800-rpm                           | 203-hp/1  | ,800-rpm                                      | 92-hp/2,200-rpm  |                              |
| Source Status <sup>2</sup> N  |                            | S   | Ň                                  | IS  | N   | IS   |                              |
| Date Installed/<br>Modified/Remo  | ved/Relocated <sup>3</sup> | TI  | BD                                 | TI  | BD  | TI   | BD                           |
| Engine Manufac<br>/Reconstruction   |                            | After 1   | /1/2011                            | After 1   | /1/2011                                       | After 7  | /1/2008                      |
| Check all applicable Federal<br>Rules for the engine (include<br>EPA Certificate of Conformity<br>if applicable) <sup>5</sup> |                            | <ul> <li>⋈ 40CFR60 Subpart JJJJ</li> <li>□ JJJJ Certified?</li> <li>□ 40CFR60 Subpart IIII</li> <li>□ IIII Certified?</li> <li>⋈ 40CFR63 Subpart ZZZZ</li> <li>□ NESHAP ZZZZ/ NSPS</li> <li>JJJJ Window</li> <li>□ NESHAP ZZZZ Remote</li> <li>Sources</li> </ul> |                                    | <ul> <li>⋈ 40CFR60 Subpart JJJJ</li> <li>□ JJJJ Certified?</li> <li>□ 40CFR60 Subpart IIII</li> <li>□ IIII Certified?</li> <li>⋈ 40CFR63 Subpart ZZZZ</li> <li>□ NESHAP ZZZZ/ NSPS</li> <li>JJJJ Window</li> <li>□ NESHAP ZZZZ Remote</li> <li>Sources</li> </ul> |   | <ul> <li>⋈ 40CFR60 Subpart JJJJ</li> <li>□ JJJJ Certified?</li> <li>□ 40CFR60 Subpart IIII</li> <li>□ IIII Certified?</li> <li>⋈ 40CFR63 Subpart ZZZZ</li> <li>□ NESHAP ZZZZ/ NSPS</li> <li>JJJJ Window</li> <li>□ NESHAP ZZZZ Remote Sources</li> </ul> |                              |
| Engine Type <sup>6</sup>  |                            | 4SRB  |                                    | 4SRB  |   | 4SRB   |                              |
| APCD Type <sup>7</sup> NSCI   |                            | CR  | NSCR                               |   | NSCR  |  |                              |
| Fuel Type <sup>8</sup>  | ype <sup>8</sup> PQ        |   | Q                                  | Р   | Q   | PQ   |                              |
| H <sub>2</sub> S (gr/100 scf) Neg   |                            | Negli   | gible                              | Negl  | igible  | Negl   | igible                       |
| Operating bhp/rpm   |                            | 203-hp/1  | ,800-rpm                           | 203-hp/1  | ,800-rpm                                      | 92-hp/2  | ,200-rpm                     |
| BSFC (BTU/bhj   | p-hr)                      | 9,015   |                                    | 9,0   | )15   | 8,:  | 500                          |
| Hourly Fuel Th  | coughput                   | 2,022 ft <sup>3</sup> /hr<br>gal/hr   |                                    | 2,022 ft <sup>3</sup> /hr<br>gal/hr   |   | 864 ft <sup>3</sup> /hr<br>gal/hr  |                              |
| Annual Fuel Th:<br>(Must use 8,760<br>emergency gene  | hrs/yr unless              | 17.71 MMft <sup>3</sup> /yr<br>gal/yr   |                                    | 17.71 MMft <sup>3</sup> /yr<br>gal/yr   |   | 7.57 MMft <sup>3</sup> /yr<br>gal/yr   |                              |
| Fuel Usage or H<br>Operation Meter  |                            | Yes 🗆   | No 🛛                               | Yes 🗆   | No 🖂  | Yes 🗆  | No 🛛                         |
| Calculation<br>Methodology <sup>9</sup>   | Pollutant <sup>10</sup>    | Hourly<br>PTE<br>(lb/hr) <sup>11</sup>  | Annual<br>PTE<br>(tons/year)<br>11 | Hourly<br>PTE<br>(lb/hr) <sup>11</sup>  | Annual<br>PTE<br>(tons/year)<br><sup>11</sup> | Hourly<br>PTE<br>(lb/hr) <sup>11</sup>   | Annual<br>PTE<br>(tons/year) |
| MD  | NO <sub>x</sub>            | 0.45  | 1.96                               | 0.45  | 1.96  | 0.20   | 0.89                         |
| MD  | СО                         | 0.90  | 3.92                               | 0.90  | 3.92  | 0.41   | 1.78                         |
| MD  | VOC                        | 0.23  | 1.00                               | 0.23  | 1.00  | 0.10   | 0.43                         |
| AP  | SO <sub>2</sub>            | < 0.01  | < 0.01                             | < 0.01  | < 0.01  | < 0.01   | < 0.01                       |
| AP  | PM <sub>10</sub>           | 0.02  | 0.08                               | 0.02  | 0.08  | 0.01   | 0.03                         |
| MD  | Formaldehyde               | 0.11  | 0.49                               | 0.11  | 0.49  | 0.02   | 0.07                         |
| AP  | Total HAPs                 | 0.13  | 0.58                               | 0.13  | 0.58  | 0.02   | 0.11                         |
| MD and EPA  | GHG (CO <sub>2</sub> e)    | 217.27  | 951.66                             | 217.27  | 951.66  | 91.57  | 401.08                       |

1 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-2, 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.
- 5 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:

GRI-HAPCalc<sup>TM</sup>

GR

|   | 2SLB<br>4SLB                      | Two Stroke Lean Burn<br>Four Stroke Lean Burn   | 4SR      | B Four St                  | roke Rich Burn   |           |            |       |
|---|-----------------------------------|---|----------|----------------------------|--|-----------|------------|-------|
| 7 | Enter th                          | e Air Pollution Control Device (APCD) type design   | ation(s) | using the fo               | ollowing codes:  |           |            |       |
|   | A/F<br>HEIS<br>PSC<br>NSCR<br>SCR | Air/Fuel Ratio<br>High Energy Ignition System<br>Prestratified Charge<br>Rich Burn & Non-Selective Catalytic Reduction<br>Lean Burn & Selective Catalytic Reduction |          | IR<br>SIPC<br>LEC<br>OxCat | Ignition Retard<br>Screw-in Precombustion C<br>Low Emission Combustion<br>Oxidation Catalyst |           | 'S         |       |
| 8 | Enter th                          | e Fuel Type using the following codes:  |          |                            |  |           |            |       |
|   | PQ                                | Pipeline Quality Natural Gas R  | G        | Raw Natura                 | l Gas /Production Gas  | D         | Diesel     |       |
| 9 | Enter t                           | he Potential Emissions Data Reference design  | nation   | using the f                | ollowing codes. Attach a   | ıll refei | rence data | used. |
|   | MD                                | Manufacturer's Data   |          | AP AP                      | -42  |           |            |       |

10 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*.

Other

(please list)

OT

11 PTE for engines shall be calculated from manufacturer's data unless unavailable.

### Engine Air Pollution Control Device (Emission Unit ID# APC-NSCR-ENG1 – ENG3 use extra pages as necessary)

Air Pollution Control Device Manufacturer's Data Sheet included? Yes  $\boxtimes$  No  $\square$ 

| $\boxtimes$ NSCR  | $\Box$ SCR                 | □ Oxidation Catalyst                                 |
|---|----------------------------|--|
| Provide details of process control used for proper a                          | mixing/control of reduc    | ing agent with gas stream:                           |
| Manufacturer: N/A   | Model #:                   | N/A  |
| Design Operating Temperature: 1,101 °F  | Design ga                  | s volume: 678 acfm                                   |
| Service life of catalyst:   | Provide m                  | anufacturer data? 🛛 Yes 🛛 No                         |
| Volume of gas handled: acfm at °F   |                            | temperature range for NSCR/Ox Cat:<br>°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 p                            |                            | ation is not meeting design conditions:              |
| Is temperature and pressure drop of catalyst requir $\Box$ Yes $\boxtimes$ No | ed to be monitored per     | 40CFR63 Subpart ZZZZ?                                |
|   | -                          | •  |

NSPS/GACT,

### Engine Air Pollution Control Device (Emission Unit ID# APC-NSCR-ENG4 – ENG5 use extra pages as necessary)

Air Pollution Control Device Manufacturer's Data Sheet included? Yes  $\boxtimes$  No  $\square$ 

| $\boxtimes$ NSCR  | $\Box$ SCR                 | Oxidation Catalyst                                   |
|---|----------------------------|--|
| Provide details of process control used for proper m  | nixing/control of redu     | cing agent with gas stream:                          |
| Manufacturer: N/A   | Model #:                   | N/A  |
| Design Operating Temperature: 1,096 °F  | Design ga                  | s volume: 1,002 acfm                                 |
| Service life of catalyst:   | Provide r                  | nanufacturer data? 🛛 Yes 🛛 No                        |
| Volume of gas handled: acfm at °F   |                            | temperature range for NSCR/Ox Cat:<br>°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 provide descripting description of w |                            |  |
| How often is catalyst recommended or required to b  | a raplaced (hours of       |  |
| The worker is easily of recommended of required to a  | le replaced (nours of      | operation)?  |

NSPS/GACT,

## Engine Air Pollution Control Device (Emission Unit ID# APC-NSCR-ENG6 use extra pages as necessary)

Air Pollution Control Device Manufacturer's Data Sheet included? Yes  $\boxtimes$  No  $\square$ 

| $\boxtimes$ NSCR $\square$ SC   | R 🗆 Oxidation Catalyst  |
|---|---|
| Provide details of process control used for proper mixing/                            | control of reducing agent with gas stream:                              |
| Manufacturer: Miratech  | Model #: VXCI-1005-3.5-XC1  |
| Design Operating Temperature: 1,200 °F  | Design gas volume: 650 acfm   |
| Service life of catalyst:   | Provide manufacturer data? 🛛 Yes 🛛 No                                   |
| Volume of gas handled: acfm at °F   | Operating temperature range for NSCR/Ox Cat:<br>From 750 °F to 1,350 °F |
| Reducing agent used, if any:  | Ammonia slip (ppm):   |
| Pressure drop against catalyst bed (delta P): 4 inches of H                           | I <sub>2</sub> O  |
| Provide description of warning/alarm system that protects                             |   |
| Is temperature and pressure drop of catalyst required to be $\Box$ Yes $\boxtimes$ No |   |
|   | · · ·   |

NSPS/GACT,

# G3306 NA

GAS COMPRESSION APPLICATION

#### GAS ENGINE SITE SPECIFIC TECHNICAL DATA

## **CATERPILLAR**

| ENGINE SPEED (rpm):          | 1800     | FUEL SYSTEM:                       | LPG IMPCO         |
|------------------------------|----------|------------------------------------|-------------------|
| COMPRESSION RATIO            | 10,5:1   | WITH CUSTOMER SUPPLIED AIR F       | UEL RATIO CONTROL |
| JACKET WATER OUTLET (°F):    | 210      | SITE CONDITIONS:                   |                   |
| COOLING SYSTEM:              | JW+OC    | FUEL:                              | Nat Gas           |
| IGNITION SYSTEM              | MAG      | FUEL PRESSURE RANGE(psig):         | 1.5-10.0          |
| EXHAUST MANIFOLD:            | WC       | FUEL METHANE NUMBER:               | 84.8              |
| COMBUSTION                   | Catalyst | FUEL LHV (Btu/scf):                | 905               |
| EXHAUST O2 EMISSION LEVEL %: | 0.5      | ALTITUDE(ft):                      | 500               |
| SET POINT TIMING:            | 30.0     | MAXIMUM INLET AIR TEMPERATURE(°F): | 77                |
|                              |          | NAMEPLATE RATING:                  | 145 bhp@1800rpm   |

|                       |       | MAXIMUM<br>RATING | SITE RATING AT MAXIMUM INLET AIR<br>TEMPERATURE |      |     |     |
|-----------------------|-------|-------------------|---|------|-----|-----|
| 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   |
| NLET 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                    |        |          |       |       |       |      |
|-----------------------------------|--------|----------|-------|-------|-------|------|
| 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  |

7842

# HEAT EXCHANGER SIZING CRITERIA

| TOTAL JACKET WATER CIRCUIT (JW+OC) | (12) | Btu/min |  |
|------------------------------------|------|---------|--|
|                                    |      |         |  |

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.

For notes information consult page three.



772 Airfield Lane Sheridan, WY 82801 Office: 307.673.0883 EST@emittechnologies.com

### **Prepared For:**

**Jason Stinson** MIDCON COMPRESSION, LP

# MANUFACTURED ON OR AFTER 1/1/2011

### INFORMATION PROVIDED BY CATERPILLAR

| Engine:                 | G3306 NA    |
|-------------------------|-------------|
| Horsepower              | 145         |
| RPM:                    | 1800        |
| Compression Ratio:      | 10.5:1      |
| Exhaust Flow Rate:      | 678 CFM     |
| Exhaust Temperature:    | 1101 °F     |
| Reference:              | DM5053-07   |
| Fuel:                   | Natural Gas |
| 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: Catalyst Type: Manufacturer: Element Size: Catalyst Elements: Housing Type: Catalyst Installation: Construction: Sample Ports: Inlet Connections: Outlet Connections: Configuration: Silencer: Silencer Grade: Insertion Loss:

#### EAH-1200T-0404F-21CEE

NSCR, Precious group metals EMIT Technologies, Inc. Round 12 x 3.5

1 2 Element Capacity Accessible Housing 10 gauge Carbon Steel 6 (0.5" NPT) 4" Flat Face Flange 4" Flat Face Flange End In / End Out Integrated Hospital 35-40 dBA

#### **Air Fuel Ratio Controller**

Model: ENG-S-075-T EMIT Technologies, Inc. Manufacturer: EDGE NG Air Fuel Ratio Controller Description: 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

# G3306 NON-CURRENT

GAS COMPRESSION APPLICATION

ENGINE SPEED (rpm): COMPRESSION RATIO: AFTERCOOLER TYPE: AFTERCOOLER WATER INLET (° JACKET WATER OUTLET (°F): ASPIRATION: COOLING SYSTEM: CONTROL SYSTEM: EXHAUST MANIFOLD: COMBUSTION: EXHAUST OXYGEN (% O2): SET POINT TIMING:

GAS ENGINE SITE SPECIFIC TECHNICAL DATA

# **CATERPILLAR®**

| (°F): | 1800<br>8<br>SCAC<br>130<br>210<br>TA<br>JW+OC, AC<br>MAG<br>WC<br>CATALYST SETTING<br>0.5<br>27 | RATING STRATEGY:<br>RATING LEVEL:<br>FUEL SYSTEM:<br>SITE CONDITIONS:<br>FUEL:<br>FUEL PRESSURE RANGE(psig)<br>FUEL METHANE NUMBER:<br>FUEL LHV (Btu/scf):<br>ALTITUDE(ft):<br>MAXIMUM INLET AIR TEMPERA<br>STANDARD RATED POWER: | : (See note 1) | STANDARD<br>CONTINUOUS<br>HPG IMPCO<br>ED AIR FUEL RATIO CONTROL<br>Gas Analysis<br>12.0-24.9<br>52.8<br>1235<br>500<br>77<br>203 bhp@1800rpm |
|-------|--|---|----------------|---|
|       |  |   |                | 77  |

| RATING   |                                       |  | RATING                            | INLET A                           |                                   |                                   |
|--|---------------------------------------|--|-----------------------------------|-----------------------------------|-----------------------------------|-----------------------------------|
| ENGINE POWER   | NOTES                                 | LOAD   | 100%                              | 100%                              | 75%                               | 50%                               |
| INLET AIR TEMPERATURE (WITHOUT FAN)  | (2)                                   | bhp<br>°E  | 203                               | 203<br>77                         | 152                               | 101                               |
| ENGINE DATA  |                                       |  |                                   |                                   | 77                                | 77                                |
| FUEL CONSUMPTION (LHV)           FUEL CONSUMPTION (HHV)           AIR FLOW (@inlet air temp, 14.7 psia)           AIR FLOW           FUEL FLOW (60°F, 14.7 psia)           INLET MANIFOLD PRESSURE | (3)<br>(3)<br>(4)(5)<br>(4)(5)<br>(6) | Btu/bhp-hr<br>Btu/bhp-hr<br>ft3/min<br>Ib/hr<br>scfm | 8192<br>9015<br>312<br>1384<br>22 | 8192<br>9015<br>312<br>1384<br>22 | 8540<br>9398<br>249<br>1106<br>18 | 9301<br>10236<br>182<br>807<br>13 |

| EXHAUST TEMPERATURE - ENGINE OUTLET                   | (6)<br>(7)  | in Hg(abs)<br>°F | 37.8  | 37.8  | 31.7  | 24.5  |
|---|---|------------------|-------|-------|-------|-------|
| EXHAUST GAS FLOW (@engine outlet temp, 14.5 psia) (Wi | and the second se |                  | 1096  | 1096  | 1061  | 1018  |
| EXHAUST GAS MASS FLOW                                 | (0)(0)  | ft3/min          | 1002  | 1002  | 781   | 554   |
| (14)  | ET) (8)(5)  | lb/hr            | 1464  | 1464  | 1168  | 853   |
| EMISSIONS DATA - ENGINE OUT                           |   |                  |       |       |       |       |
| NOx (as NO2)  | (9)(10)   | a/bbp.br         | 45.70 | 1     |       | T     |
| CO  |   | g/bhp-hr         | 15.79 | 15.79 | 15.50 | 13.13 |
| THC (mol. wt. of 15.84)                               | (9)(10)   | g/bhp-hr         | 15.79 | 15.79 | 15.50 | 13.13 |
| NMHC (mol. wt. of 15.84)                              | (9)(10)   | g/bhp-hr         | 1.00  | 1.00  | 1.16  | 1.40  |
| NMNEHC (VOCs) (mol. wt. of 15.84)                     | (9)(10)   | g/bhp-hr         | 0.53  | 0.53  | 0.61  | 0.73  |
| HCHO (Formaldehyde)                                   | (9)(10)(11)   | g/bhp-hr         | 0.26  | 0.26  | 0.31  | 0.37  |
| CO2   | (9)(10)   | g/bhp-hr         | 0.25  | 0.25  | 0.25  | 0.25  |
| EXHAUST OXYGEN  | (9)(10)   | g/bhp-hr         | 569   | 569   | 611   | 677   |
|   | (9)(12)   | % DRY            | 0.4   | 0.4   | 0.4   | 0.4   |
| HEAT REJECTION  |   |                  |       |       |       |       |
| HEAT REJ. TO JACKET WATER (JW)                        | (13)  | Btu/min          | 9012  | 9012  | 7507  |       |
| HEAT REJ. TO ATMOSPHERE                               | (13)  | Btu/min          | 1108  |       | 7527  | 6036  |
| HEAT REJ. TO LUBE OIL (OC)                            | (13)  | Btu/min          |       | 1108  | 866   | 629   |
| HEAT REJ. TO AFTERCOOLER (AC)                         |   |                  | 1425  | 1425  | 1190  | 954   |
|   | (13)(14)  | Btu/min          | 532   | 532   | 214   | 31    |
| COOLING SYSTEM SIZING CRITERIA                        |   |                  |       |       |       |       |
| TOTAL JACKET WATER CIRCUIT (JW+OC)                    | (14)  | Btu/min          | 11004 | 1     |       |       |
| TOTAL AFTERCOOLER CIRCUIT (AC)                        | (14)  | Du/IIII          | 11624 |       |       |       |

A cooling system safety factor of 0% has been added to the cooling system sizing criteria.

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. Maximum rating is the maximum capability at the specified aftercooler inlet temperature 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.

(14)(15)

Btu/min

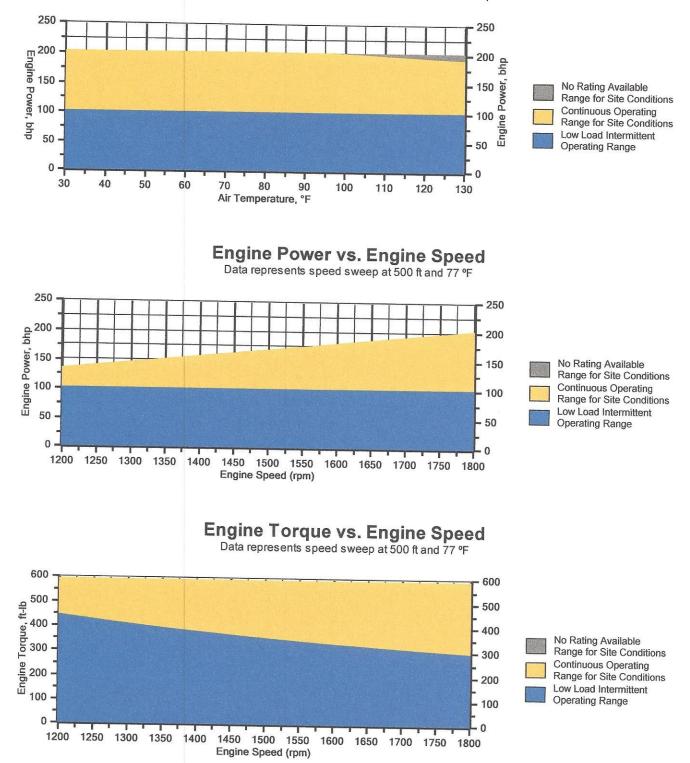
558

For notes information consult page three. \*\*\*WARNINGS ISSUED FOR THIS RATING CONSULT PAGE 3\*\*\*



Engine Power vs. Inlet Air Temperature

Data represents temperature sweep at 500 ft and 1800 rpm



Note: At site conditions of 500 ft and 77°F inlet air temp., constant torque can be maintained down to 1200 rpm. The minimum speed for loading at these conditions is 1200 rpm.

PREPARED BY: cdmgerp cdmgerp, cdmrm Data generated by Gas Engine Rating Pro Version 6.04.00 Ref. Data Set DM5202-07-001, G6X, Printed 15Feb2017

# NON-CURRENT

#### GAS ENGINE SITE SPECIFIC TECHNICAL DATA



GAS COMPRESSION APPLICATION

#### NOTES

1. Fuel pressure range specified is to the engine fuel pressure regulator. Additional fuel train components should be considered in pressure and flow calculations.

2. Engine rating is with two engine driven water pumps. Tolerance is  $\pm$  3% of full load.

3. Fuel consumption tolerance is ± 5.0% of full load data.

4. Air flow value is on a 'wet' basis. Flow is a nominal value with a tolerance of  $\pm$  5 %.

5. Inlet and Exhaust Restrictions must not exceed A&I limits based on full load flow rates from the standard technical data sheet.

Inlet manifold pressure is a nominal value with a tolerance of ± 5 %.

7. Exhaust temperature is a nominal value with a tolerance of (+)63°F, (-)54°F.

8. Exhaust flow value is on a "wet" basis. Flow is a nominal value with a tolerance of  $\pm$  6 %.

9. Emissions data is at engine exhaust flange prior to any after treatment.

10. Emission values are based on engine operating at steady state conditions. Fuel methane number cannot vary more than ± 3. Values listed are higher than nominal levels to allow for instrumentation, measurement, and engine-to-engine variations. They indicate "Not to Exceed" values. THC, NMHC, and NMNEHC do not include aldehydes. Part Load data

11. VOCs - Volatile organic compounds as defined in US EPA 40 CFR 60, subpart JJJJ

12. Exhaust Oxygen tolerance is ± 0.2.

13. Heat rejection values are nominal. Tolerances, based on treated water, are ± 10% for jacket water circuit, ± 50% for radiation, ± 20% for lube oil circuit, and ± 5% for aftercooler

14. Aftercooler heat rejection includes an aftercooler heat rejection factor for the site elevation and inlet air temperature specified. Aftercooler heat rejection values at part load are for reference only. Do not use part load data for heat exchanger sizing.

15. Cooling system sizing criteria are maximum circuit heat rejection for the site, with applied tolerances.

#### WARNING(S):

1. The lower heating value of the fuel is higher than or equal to 1050 Btu/scf and lower than 1400 Btu/scf. May require on-site adjustment or tuning of the fuel system hardware.

RECOMMENDED ACTION For additional information please contact your Caterpillar engine dealer.

| Constituent      | Abbrev    | Mole %   | Norm     |   |                |
|------------------|-----------|----------|----------|---|----------------|
| Water Vapor      | H2O       | 0.0000   | 0.0000   |   |                |
| Methane          | CH4       | 69.4050  | 69,4050  | Fuel Makeup:  |                |
| Ethane           | C2H6      | 18.9290  | 18,9290  | Unit of Measure:                                    | Gas Analysis   |
| Propane          | C3H8      | 7.4500   | 7.4500   | onit of Measure.                                    | English        |
| Isobutane        | iso-C4H1O | 0.6140   | 0.6140   |   |                |
| Norbutane        | nor-C4H1O | 1.8670   | 1.8670   | Calculated Fuel Properties                          |                |
| Isopentane       | iso-C5H12 | 0.2950   | 0.2950   | Caterpillar Methane Number:                         | 52.8           |
| Norpentane       | nor-C5H12 | 0.4460   | 0.4460   |   |                |
| Hexane           | C6H14     | 0.4130   | 0.4130   | Lower Heating Value (Btu/scf):                      | 1235           |
| Heptane          | C7H16     | 0.0000   | 0.0000   | Higher Heating Value (Btu/scf):                     | 0.0484.0304440 |
| Nitrogen         | N2        | 0.5680   | 0.5680   | WOBBE Index (Btu/scf):                              | 1359           |
| Carbon Dioxide   | CO2       | 0.0130   | 0.0130   | WOBBE Index (Blu/SCI):                              | 1398           |
| Hydrogen Sulfide | H2S       | 0.0000   | 0.0000   |   |                |
| Carbon Monoxide  | CO        | 0.0000   | 0.0000   | THC: Free Inert Ratio:                              | 171.12         |
| Hydrogen         | H2        | 0.0000   | 0.0000   | Total % Inerts (% N2, CO2, He):                     | 0.58%          |
| Oxygen           | 02        | 0.0000   | 0.0000   | RPC (%) (To 905 Btu/scf Fuel):                      | 100%           |
| Helium           | HE        | 0.0000   | 0.0000   | 14 Brandiades Executentinosciences execute designed | 100 /8         |
| Neopentane       | neo-C5H12 | 0.0000   | 0.0000   | Compressibility Factor:                             | 0.000          |
| Octane           | C8H18     | 0.0000   | 0.0000   | Stoich A/F Ratio (Vol/Vol):                         | 0.996          |
| Nonane           | C9H20     | 0.0000   | 0.0000   |   | 12.78          |
| Ethylene         | C2H4      | 0.0000   | 0.0000   | Stoich A/F Ratio (Mass/Mass):                       | 16.37          |
| Propylene        | C3H6      | 0.0000   | 0.0000   | Specific Gravity (Relative to Air):                 | 0.781          |
| TOTAL (Volume %) |           | 100.0000 | 100.0000 | Fuel Specific Heat Ratio (K):                       | 1.268          |
|                  |           |          |          |   |                |

CONDITIONS AND DEFINITIONS Caterpillar Methane Number represents the knock resistance of a gaseous fuel. It should be used with the Caterpillar Fuel Usage Guide for the engine and rating to determine the rating for the fuel specified. A Fuel Usage Guide for each rating is included on page 2 of its standard technical data sheet.

RPC always applies to naturally aspirated (NA) engines, and turbocharged (TA or LE) engines only when they are derated for altitude and ambient site conditions.

Project specific technical data sheets generated by the Caterpillar Gas Engine Rating Pro program take the Caterpillar Methane Number and RPC into account when generating a site rating.

Fuel properties for Btu/scf calculations are at 60F and 14.696 psia.

Caterpillar shall have no liability in law or equity, for damages, consequently or otherwise, arising from use of program and related material or any part thereof.

#### FUEL LIQUIDS

Field gases, well head gases, and associated gases typically contain liquid water and heavy hydrocarbons entrained in the gas. To prevent detonation and severe damage to the engine, hydrocarbon liquids must not be allowed to enter the engine fuel system. To remove liquids, a liquid separator and coalescing filter are recommended, with an automatic drain and collection tank to prevent contamination of the ground in accordance with local codes and standards.

To avoid water condensation in the engine or fuel lines, limit the relative humidity of water in the fuel to 80% at the minimum fuel operating temperature.

WARNING(S)
1. The lower heating value of the fuel is higher than or equal to 1050 Btu/scf and lower than 1400 Btu/scf. May require on-site adjustment or tuning of the fuel system hardware.

RECOMMENDED ACTION For additional information please contact your Caterpillar engine dealer.



# **MIRATECH Emissions Control Equipment Specification Summary**

|                               |                     |                                | Proposal Number:     | TJ-12-2475        |  |  |  |
|-------------------------------|---------------------|--------------------------------|----------------------|-------------------|--|--|--|
| Engine Data                   |                     |                                |                      |                   |  |  |  |
| Number of Engines:            | 1                   |                                |                      |                   |  |  |  |
| Application:                  |                     | ompression                     |                      |                   |  |  |  |
| Engine Manufacturer:          |                     | al Motors                      |                      |                   |  |  |  |
| Model Number:                 | Vortec              | Vortec 5.7L NA                 |                      |                   |  |  |  |
| Power Output:                 | 92 bhp              | 92 bhp                         |                      |                   |  |  |  |
| Lubrication Oil:              | 0.6 wt <sup>r</sup> | % sulfated ash or less         |                      |                   |  |  |  |
| Type of Fuel:                 | Natura              | l Gas                          |                      |                   |  |  |  |
| Exhaust Flow Rate:            | 650 ac              | cfm (cfm)                      |                      |                   |  |  |  |
| Exhaust Temperature:          | 1,200°              | F                              |                      |                   |  |  |  |
| System Details                |                     |                                |                      |                   |  |  |  |
| Housing Model Number:         | VXCI-               | 1005-3.5-HSG                   |                      |                   |  |  |  |
| Element Model Number:         | VX-RE               | VX-RE-05XC                     |                      |                   |  |  |  |
| Number of Catalyst Layers:    | 1                   | 1                              |                      |                   |  |  |  |
| Number of Spare Catalyst La   | yers: 1             | 1                              |                      |                   |  |  |  |
| System Pressure Loss:         | 4.0 inc             | hes of WC (Fresh)              |                      |                   |  |  |  |
| Sound Attenuation:            | 28-32               | dBA insertion loss             |                      |                   |  |  |  |
| Exhaust Temperature Limits:   | 750 –               | 1250°F (catalyst inlet); 1350° | 'F (catalyst outlet) |                   |  |  |  |
| NSCR Housing & Cataly         | yst Details         |                                |                      |                   |  |  |  |
| Model Number:                 | VXCI-               | 1005-3.5-XC1                   |                      |                   |  |  |  |
| Material:                     | Carbo               | n Steel                        |                      |                   |  |  |  |
| Inlet Pipe Size & Connection: | 3.5 inc             | h FF Flange, 150# ANSI star    | idard bolt pattern   |                   |  |  |  |
| Outlet Pipe Size & Connection | n: 3.5 inc          | h FF Flange, 150# ANSI star    | idard bolt pattern   |                   |  |  |  |
| Overall Length:               | 43 incl             | hes                            |                      |                   |  |  |  |
| Weight Without Catalyst:      | 98 lbs              |                                |                      |                   |  |  |  |
| Weight Including Catalyst:    | 104 lb:             | S                              |                      |                   |  |  |  |
| Instrumentation Ports:        | 1 inlet/            | 1 outlet (1/2" NPT)            |                      |                   |  |  |  |
| Emission Requirements         | S                   |                                |                      |                   |  |  |  |
|                               |                     |                                | Warranted            |                   |  |  |  |
|                               | Engine Outputs      |                                | Converter Outputs    | Requested         |  |  |  |
| Exhaust Gases                 | (g/ bhp-hr)         | Reduction (%)                  | (g/ bhp-hr)          | Emissions Targets |  |  |  |
| NOx                           | 14.00               | 93%                            | 1.00                 | 1 g/bhp-hr        |  |  |  |
| <u></u>                       | 44.00               | 000/                           | 0.00                 | 0 // / /          |  |  |  |

MIRATECH warrants the performance of the converter, as stated above, per the MIRATECH General Terms and Conditions of Sale.

82%

0%

2.00

0.70

11.00

0.40

0.5%

CO

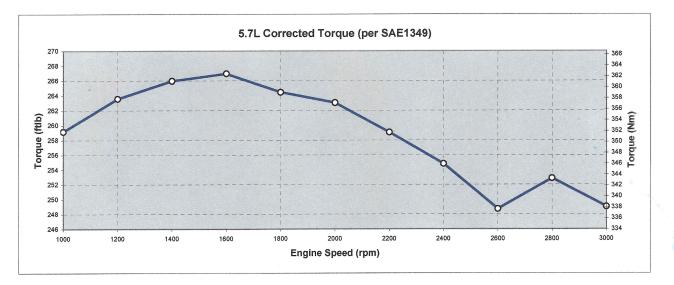
NMNEHC

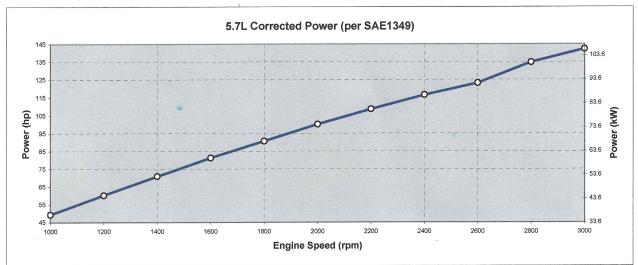
Oxygen

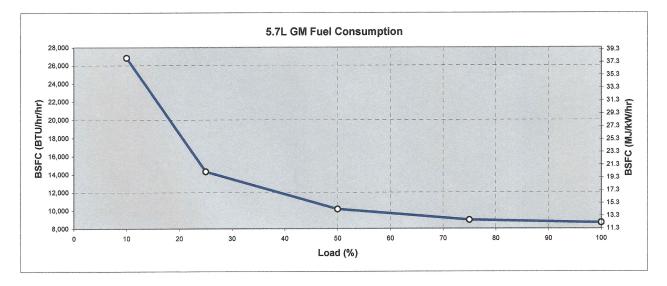
2 g/bhp-hr

.7 g/bhp-hr









## Table 3.2-3. UNCONTROLLED EMISSION FACTORS FOR 4-STROKE RICH-BURN ENGINES<sup>a</sup> (SCC 2-02-002-53)

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

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

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

<sup>a</sup> Reference 7. Factors represent uncontrolled levels. For NO<sub>x</sub>, 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.

<sup>b</sup> Emission factors were calculated in units of (lb/MMBtu) based on procedures in EPA Method 19. To convert from (lb/MMBtu) to (lb/ $10^6$  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, d/operating HP, 1/hp

<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  $\% \text{CON} = \text{percent conversion of fuel carbon to CO}_2$ ,

62

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

- <sup>e</sup> Based on 100% conversion of fuel sulfur to SO<sub>2</sub>. Assumes sulfur content in natural gas of 2,000  $\text{gr/10}^6$  scf.
- <sup>f</sup> 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.
- <sup>h</sup> 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.
- <sup>i</sup> No data were available for uncontrolled engines. PM10 emissions are for engines equipped with a PCC.
- <sup>j</sup> Considered  $\leq 1 \ \mu$ 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

**AP-42 EMISSION FACTORS** 

## 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#:<br>EU-LOAD-COND  |               | Emission Point ID#:<br>EP-LOAD-COND/AP |             |              | COMB Year Installed/Modified: 2013 |            |                       | ified: 2013/2018 |
|---|---------------|--|-------------|--------------|------------------------------------|------------|-----------------------|------------------|
| Emission Unit Description: Condensate Truck Loading Emissions   |               |  |             |              |                                    |            |                       |                  |
|   |               |  | Loading A   | Area Data    |                                    |            |                       |                  |
| Number of Pumps: 1Number of Liquids Loaded: 1Max number of trucks/rail cars loadin<br>at one (1) time: 1  |               |  |             |              |                                    |            | cks/rail cars loading |                  |
| Are tanker trucks/rail cars pressure tested for leaks at this or any other location? $\Box$ Yes $\boxtimes$ No $\Box$ Not Required If Yes, Please describe:   |               |  |             |              |                                    |            | □ Not Required        |                  |
| Provide description of closed vent system and any bypasses. Vapors are collected and routed to a vapor combustor.   |               |  |             |              |                                    | combustor. |                       |                  |
| <ul> <li>Are any of the following truck/rail car loadout systems utilized?</li> <li>Closed System to tanker truck/rail car passing a MACT level annual leak test?</li> <li>Closed System to tanker truck/rail car passing a NSPS level annual leak test?</li> <li>Closed System to tanker truck/rail car not passing an annual leak test and has vapor return?</li> </ul> |               |  |             |              |                                    |            |                       |                  |
|   | jected Maximu | _                                      | -           |              |                                    | -          | whole)                |                  |
| Time  | Jan – M       | ar                                     | Apr         | - Jun        | J                                  | ul – Sept  |                       | Oct - Dec        |
| Hours/day   | 24            |  | 2           | 24           |                                    | 24         |                       | 24               |
| Days/week   | 5             |  | :           | 5            |                                    | 5          |                       | 5                |
|   | Bu            | k Liquid                               | Data (use e | xtra pages a | s necess                           | ary)       |                       |                  |
| Liquid Name   | Condens       | ate                                    |             |              |                                    |            |                       |                  |
| Max. Daily Throughput<br>(1000 gal/day)   | 56.64         |  |             |              |                                    |            |                       |                  |
| Max. Annual Throughpu<br>(1000 gal/yr)  | ut 20,672.    | 51                                     |             |              |                                    |            |                       |                  |
| Loading Method <sup>1</sup>   | SUB           |  |             |              |                                    |            |                       |                  |
| Max. Fill Rate (gal/min)  | ) 125         |  |             |              |                                    |            |                       |                  |
| Average Fill Time<br>(min/loading)  | Approx.       | 60                                     |             |              |                                    |            |                       |                  |
| Max. Bulk Liquid<br>Temperature (°F)  | 93.83         | 93.83                                  |             |              |                                    |            |                       |                  |
| True Vapor Pressure <sup>2</sup>  | 13.6190       | 13.6190                                |             |              |                                    |            |                       |                  |
| Cargo Vessel Condition <sup>3</sup> U   |               |  |             |              |                                    |            |                       |                  |
| Control Equipment or<br>Method <sup>4</sup>   |               | or Return<br>tion Cont                 |             |              |                                    |            |                       |                  |
| Max. Collection Efficient<br>(%)  | ncy 70%       |  |             |              |                                    |            |                       |                  |

| Max. Control (%)               | l Efficiency       | 98%                                  |  |
|--------------------------------|--------------------|--------------------------------------|--|
| Max.VOC<br>Emission            | Loading<br>(lb/hr) | 19.37                                |  |
| Rate                           | Annual<br>(ton/yr) | 26.95                                |  |
| Max.HAP                        | Loading<br>(lb/hr) | 1.25                                 |  |
| Emission<br>Rate               | Annual<br>(ton/yr) | 1.74                                 |  |
| Estimation Method <sup>5</sup> |                    | EPA/O = ProMax process<br>simulation |  |

| Emission Unit ID#:<br>EU-LOAD-PW | Emission Point ID#:<br>EP-LOAD-PW | Year Installed/Modified: 2013/2018 |
|----------------------------------|-----------------------------------|------------------------------------|
|                                  |                                   |                                    |

Emission Unit Description: Produced Water Truck Loading Emissions

| Loading Area Data | l |
|-------------------|---|
|-------------------|---|

| Number of Pumps: 1  | Number of Liquids Loaded: 1 | Max number of trucks/rail cars load<br>at one (1) time: 1 |                | cks/rail cars loading |
|---|-----------------------------|---|----------------|-----------------------|
| Are tanker trucks/rail cars pressure tester<br>If Yes, Please describe: | □ Yes                       | 🖾 No  | □ Not Required |                       |

Provide description of closed vent system and any bypasses. Vapors are collected and routed to a vapor 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 – Mar | Apr - Jun | Jul – Sept | Oct - Dec |
|-----------|-----------|-----------|------------|-----------|
| Hours/day | 24        | 24        | 24         | 24        |
| Days/week | 5         | 5         | 5          | 5         |

| Bulk Liquid Data (u | use extra pages | as necessary) |
|---------------------|-----------------|---------------|
|                     |                 |               |

| Liquid Name                         | •                        | Produced Water                    |  |
|-------------------------------------|--------------------------|-----------------------------------|--|
| Max. Daily 7<br>(1000 gal/da        |                          | 75.96                             |  |
| Max. Annual<br>(1000 gal/yr)        | l Throughput<br>)        | 27,724.31                         |  |
| Loading Met                         | hod <sup>1</sup>         | SUB                               |  |
| Max. Fill Ra                        | te (gal/min)             | 125                               |  |
| Average Fill<br>(min/loading        |                          | Approx. 60                        |  |
| Max. Bulk L<br>Temperature          |                          | 70.00                             |  |
| True Vapor I                        | Pressure <sup>2</sup>    | 13.4905                           |  |
| Cargo Vesse                         | l Condition <sup>3</sup> | U                                 |  |
| Control Equi<br>Method <sup>4</sup> | pment or                 | N/A                               |  |
| Max. Collect (%)                    | tion Efficiency          | 0%                                |  |
| Max. Contro<br>(%)                  | l Efficiency             | 0%                                |  |
| Max.VOC<br>Emission                 | Loading<br>(lb/hr)       | 2.98                              |  |
| Rate                                | Annual<br>(ton/yr)       | 0.42                              |  |
| Max.HAP<br>Emission                 | Loading<br>(lb/hr)       | 0.19                              |  |
| Rate                                | Annual<br>(ton/yr)       | 0.03                              |  |
| Estimation N                        | 1ethod <sup>5</sup>      | EPA/O = ProMax process simulation |  |

| 1 | BF        | Bottom Fill                   | SP          | Splash Fil  | 1          |           | SUB         | Submerged Fill                |
|---|-----------|-------------------------------|-------------|-------------|------------|-----------|-------------|-------------------------------|
| 2 | At maxim  | um bulk liquid temperature    |             |             |            |           |             |                               |
| 3 | В         | Ballasted Vessel              | С           | Cleaned     |            |           | U           | Uncleaned (dedicated service) |
|   | 0         | Other (describe)              |             |             |            |           |             |                               |
| 4 | List as n | nany as apply (complete and s | ubmit app   | oropriate A | ir Polluti | on Contro | ol Device S | Sheets)                       |
|   | CA        | Carbon Adsorption             |             | VB          | Dedicate   | d Vapor I | Balance (c  | losed system)                 |
|   | ECD       | Enclosed Combustion Devic     | e           | F           | Flare      | -         |             | -                             |
|   | ТО        | Thermal Oxidization or Inci   | neration    |             |            |           |             |                               |
| 5 | EPA       | EPA Emission Factor in AP-    | -42         |             |            | MB        | Material    | Balance                       |
|   | TM        | Test Measurement based upo    | on test dat | a submitta  | al         | 0         | Other (de   | scribe)                       |

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:

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

where:

 $L_{\rm L}$  = 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,  ${}^{\circ}\hat{R}$  ( ${}^{\circ}\hat{F}$  + 460)

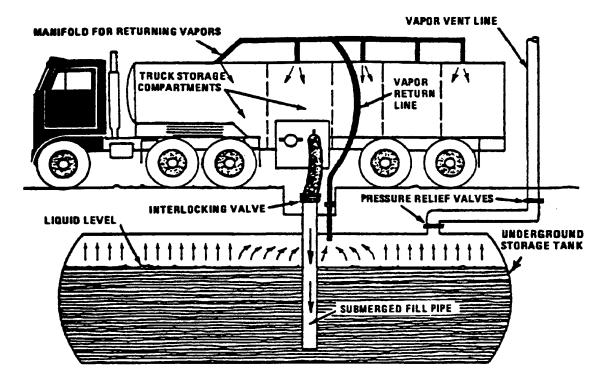


Figure 5.2-5. Tank truck unloading into a service station underground storage tank and practicing "vapor balance" form of emission control.

| 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>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<br>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?  |
| $\Box$ Yes $\boxtimes$ 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?  |
| $\Box$ Yes $\boxtimes$ 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? |
| $\Box$ Yes $\boxtimes$ 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?                                   |
| $\Box$ Yes $\boxtimes$ No   |
| 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?

 $\Box$  Yes  $\boxtimes$  No

Please list.

| Source<br>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 | 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   |  |  |  |  |  |  |  |  |  |  |

|   |                     | (In        |   | COMBUST<br>closed Com  |                        | rs)                        |   |  |  |
|---|---------------------|------------|---|--|------------------------|----------------------------|---|--|--|
|   |                     |            | Gene                                      | ral Information  |                        |                            |   |  |  |
| Control Device ID#:   | APC-CO              | MB         |   | Installation Dat   | e: TBD                 | ied                        | Relocated   |  |  |
| Maximum Rated Tota<br>11,666.7 scfh                                       | al Flow C<br>280,00 |            |   | Maximum Desi<br>Input (from mfg<br>sheet)<br>24.0 MMBTU/h  | g. spec                | Design H<br>2,682 BT       | Ieat Content<br>FU/scf  |  |  |
|   |                     |            | Control I                                 | Device Information   |                        |                            |   |  |  |
| Enclosed Combus   | stion Dev           | ice        |   | or Combustion Co<br>levated Flare  | ontrol?                |                            | Ground Flare  |  |  |
| Manufacturer: Cimar<br>Model: Low Pro 300                                 | ron                 |            |   | Hours of operat  | tion per y             | ear? 8,760                 |   |  |  |
| List the emission uni   | ts whose            | emissions  | are controlled by                         | y this vapor contr   | ol device              | (Emission                  | n Point ID# APC-COMB)   |  |  |
| Emission Unit ID#   | Emissio             | on Source  | Description                               | Emission<br>Unit ID#   | Emissio                | on Source                  | Description   |  |  |
| EU-TANKS-COND   | Conden              | sate Tanks | 8   | EU-LOAD-<br>COND   | Conden                 | isate Truck                | c Loading   |  |  |
| EU-TANKS-PW   | Produce             | ed Water T | Tanks                                     |  |                        |                            |   |  |  |
|   |                     |            |   |  |                        |                            |   |  |  |
| If this vapor con   | nbustor c           | ontrols em | issions from mo                           | re than six (6) em   | nission un             | iits, please               | e attach additional pages.                                    |  |  |
| Assist Type (Flares o   | nly)                | F          | lare Height                               | Tip D  | Diameter               | Was the design per §60.18? |   |  |  |
| Steam<br>Pressure   | Air Air Non         |            | 12 feet                                   | N/A feet   |                        |                            | ☐ Yes ⊠ No<br>Provide determination.                          |  |  |
|   |                     |            | Waste                                     | Gas Information  | l                      |                            |   |  |  |
| Maximum Waste<br>194.4 (s   |                     | Rate       |   | of Waste Gas Str<br>682 BTU/ft <sup>3</sup>  | ream                   | Exit Vel                   | locity of the Emissions Stream (ft/s)                         |  |  |
| P   | rovide an           | attachmer  | nt with the chara                         | acteristics of the v   | vaste gas              | stream to                  | be burned.  |  |  |
|   |                     |            | Pilot (                                   | Gas Information  |                        |                            |   |  |  |
| Number of Pilot L<br>4  | ights               | Flam       | w Rate to Pilot<br>e per Pilot<br>50 scfh |  | ut per Pil<br>) BTU/hr |                            | Will automatic re-ignition<br>be used?<br>⊠ Yes □ No          |  |  |
|   | pilot. If           | the re-ign | ition attempt fai                         | ls, the pilot solen  |                        |                            | trol system will automatically<br>matically close and a local |  |  |
| Is pilot flame equipper<br>presence of the flame                          |                     |            | o detect the<br>□ No                      | If Yes, what type?       □       Thermocouple       □       Infrared         □       Ultraviolet       □       Camera       ⊠       Other: flame rod |                        |                            |   |  |  |
| Describe all operatin<br>unavailable, please in                           |                     | and mainte | enance procedure                          | es required by the   | manufac                | turer to ma                | aintain the warranty. (If                                     |  |  |
| Additional information<br>Please attach copies of<br>performance testing. |                     |            |   | ngs, flame demoi   | nstration              | per §60.18                 | 3 or §63.11(b) and  |  |  |



# ITEM 1: 7'x 30' Enclosed Flare 500MSCFD

# **Combustor Data**

- 7'D x 30'L s/s Dimensions: •
- MAWP 10 psig • 53 MMBTU/HR
- MMBTU/HR
- Burner
- Flame Arrestor •
- Structure •
- Base
- Inlet Connection
- 4" NPT 1/2" Watts • Pilot Regulator

| Item #1: Pricing                |     |                |  |  |  |  |  |  |  |  |
|---------------------------------|-----|----------------|--|--|--|--|--|--|--|--|
| Description                     | Qty | Extended Price |  |  |  |  |  |  |  |  |
| 7'x 30' Enclosed Flare 500MSCFD | 1   | \$59,675       |  |  |  |  |  |  |  |  |

Staged Combustion w/ removable trays

Precast Concrete Foundation 10'x10'x12"

Carbon Steel Shell w/ 3" Fiber Frax 2300°F Insulation

# Terms/Delivery

4" Wenco

Subject To Prior Sale / 12 weeks ARO, Ex Works Mfg Facility

# ITEM 2: Low Pro 300 Enclosed Combustor

# **Combustor Data**

- Dimensions 96"W x 144"L x 144"H
- MAWP Atmospheric •
- MMBTU/HR 24 MMBTU/HR
- Jets •
- Flamecells

Inlet Connection

- Burner
- Flame Arrestor (Qty 2) 3" Wenco
- Concrete Blocks (Qty 3)-12"Wx9"Hx96"L
  - 3" NPT
- Pilot Regulator

| Item #2: Pricing               |     |                |  |  |  |  |  |  |  |  |  |
|--------------------------------|-----|----------------|--|--|--|--|--|--|--|--|--|
| Description                    | Qty | Extended Price |  |  |  |  |  |  |  |  |  |
| Low Pro 300 Enclosed Combustor | 1   | \$46,500       |  |  |  |  |  |  |  |  |  |

(Qty 4) 480 SS Jets

(Qty 4)-34"Lx41"W

1/4" Fisher 67CR-206

(Qty 10) 40" x 4"

Quote 14014 Rev1

Confidential

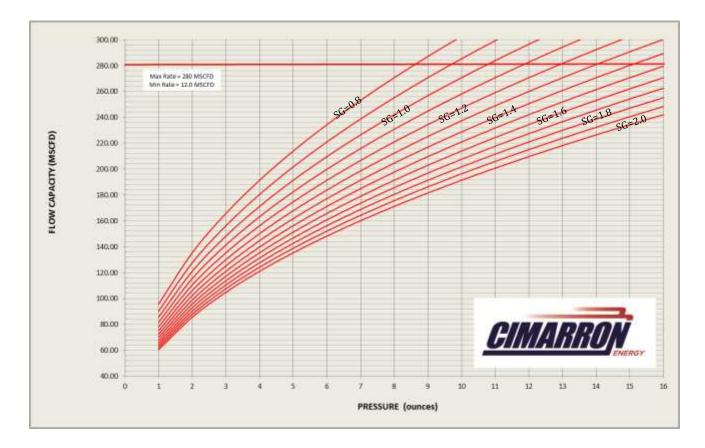


## Model Low Pro 300

### **Operational Design**

Upper Operating Flow rate: Lower Operating Flow rate: **Destruction efficiency:** 

280 MSCFD\* 12 MSCFD\* Testing on going. Designed destruction efficiency 99.999%



\*minimum net heating value of 1000 Btu/scf

### **Mechanical Design**

**Overall Dimensions:** Weight: **Burner**: Ambient Temperature: Electrical Area Classification: Non-hazardous

12'L x 8.5'W x 11'H 8000 lbs. (excludes concrete) 4 Burn Rails x 480 Jets each -20 to 120 F

#### **Options**

-Attachable Drip Pot with auto/manual drain -Dual inlet piping to handle multiple gas streams



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  $11,200 \text{ kJ/m}^3$  (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.<sup>1</sup> 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.<sup>2</sup> Sulfur compounds contained in a flare gas stream are converted to SO<sub>2</sub> when burned. The amount of SO<sub>2</sub> 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>

| Component                       | Emission Factor<br>(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                                     |

### EMISSION FACTOR RATING: B

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

<sup>b</sup> Measured as methane equivalent.

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

# ATTACHMENT T: EMISSIONS CALCULATIONS

#### SWN Production Company, LLC Thomas Parkinson Pad Summary of Criteria Air Pollutant Emissions

| Equipment   | Unit ID           | <b>Emission Point</b> | N     | Ox    | C     | 0     | Total | VOC <sup>1</sup> | S     | <b>O</b> <sub>2</sub> | PM Total |      |
|---|-------------------|-----------------------|-------|-------|-------|-------|-------|------------------|-------|-----------------------|----------|------|
| Equipment   | UNITE             | ID                    | lb/hr | TPY   | lb/hr | TPY   | lb/hr | TPY              | lb/hr | TPY                   | lb/hr    | TPY  |
| 145-hp Caterpillar G3306 NA Engine                                | EU-ENG1           | EP-ENG1               | 0.32  | 1.40  | 0.64  | 2.80  | 0.16  | 0.69             | <0.01 | <0.01                 | 0.02     | 0.11 |
| 145-hp Caterpillar G3306 NA Engine                                | EU-ENG2           | EP-ENG2               | 0.32  | 1.40  | 0.64  | 2.80  | 0.16  | 0.69             | <0.01 | <0.01                 | 0.02     | 0.11 |
| 145-hp Caterpillar G3306 NA Engine                                | EU-ENG3           | EP-ENG3               | 0.32  | 1.40  | 0.64  | 2.80  | 0.16  | 0.69             | <0.01 | <0.01                 | 0.02     | 0.11 |
| 203-hp Caterpillar G3306 TA Engine                                | EU-ENG4           | EP-ENG4               | 0.45  | 1.96  | 0.90  | 3.92  | 0.23  | 1.00             | <0.01 | <0.01                 | 0.04     | 0.16 |
| 203-hp Caterpillar G3306 TA Engine                                | EU-ENG5           | EP-ENG5               | 0.45  | 1.96  | 0.90  | 3.92  | 0.23  | 1.00             | <0.01 | <0.01                 | 0.04     | 0.16 |
| 92-hp GM Vortec 5.7L NA Engine                                    | EU-ENG6           | EP-ENG6               | 0.20  | 0.89  | 0.41  | 1.78  | 0.10  | 0.43             | <0.01 | <0.01                 | 0.02     | 0.07 |
| 1.0-mmBtu/hr GPU Burner   | EU-GPU1           | EP-GPU1               | 0.11  | 0.48  | 0.09  | 0.41  | 0.01  | 0.03             | <0.01 | <0.01                 | 0.01     | 0.04 |
| 1.0-mmBtu/hr GPU Burner   | EU-GPU2           | EP-GPU2               | 0.11  | 0.48  | 0.09  | 0.41  | 0.01  | 0.03             | <0.01 | <0.01                 | 0.01     | 0.04 |
| 1.0-mmBtu/hr GPU Burner   | EU-GPU3           | EP-GPU3               | 0.11  | 0.48  | 0.09  | 0.41  | 0.01  | 0.03             | <0.01 | <0.01                 | 0.01     | 0.04 |
| 1.0-mmBtu/hr GPU Burner   | EU-GPU4           | EP-GPU4               | 0.11  | 0.48  | 0.09  | 0.41  | 0.01  | 0.03             | <0.01 | <0.01                 | 0.01     | 0.04 |
| 1.0-mmBtu/hr GPU Burner   | EU-GPU5           | EP-GPU5               | 0.11  | 0.48  | 0.09  | 0.41  | 0.01  | 0.03             | <0.01 | <0.01                 | 0.01     | 0.04 |
| 1.5-mmBtu/hr Stabilizer Heater                                    | EU-SH1            | EP-SH1                | 0.17  | 0.73  | 0.14  | 0.61  | 0.01  | 0.04             | <0.01 | <0.01                 | 0.01     | 0.06 |
| 1.5-mmBtu/hr Stabilizer Heater                                    | EU-SH2            | EP-SH2                | 0.17  | 0.73  | 0.14  | 0.61  | 0.01  | 0.04             | <0.01 | <0.01                 | 0.01     | 0.06 |
| Six (6) 400-bbl Condensate Tanks Routed to Vapor Combustor        | EU-TANKS-<br>COND | APC-COMB              | -     | -     | -     | -     | -     | -                | -     | -                     | -        | -    |
| Six (6) 400-bbl Produced Water Tanks<br>Routed to Vapor Combustor | EU-TANKS-PW       | APC-COMB              | -     | -     | -     | -     | -     | -                | -     | -                     | -        | -    |
| Condensate Truck Loading w/ Vapor Return<br>Routed to Combustor   | EU-LOAD-<br>COND  | APC-COMB              | -     | -     | -     | -     | 6.15  | 26.95            | -     | -                     | -        | -    |
| Produced Water Truck Loading                                      | EU-LOAD-PW        | EP-LOAD-PW            | -     | -     | -     | -     | 0.10  | 0.42             | -     | -                     | -        | -    |
| 24.0-mmBtu/hr Vapor Combustor                                     | APC-COMB          | APC-COMB              | 3.31  | 14.51 | 6.61  | 28.96 | 6.98  | 30.55            | -     | -                     | 0.07     | 0.30 |
| Vapor Combustor Pilots  | EU-PILOTS         | APC-COMB              | 0.02  | 0.09  | 0.02  | 0.07  | <0.01 | <0.01            | <0.01 | <0.01                 | <0.01    | 0.01 |
| Fugitive Emissions  | EU-FUG            | EP-FUG                | -     | -     | -     | -     | 2.22  | 9.74             | -     | -                     | -        | -    |
| Fugitive Haul Road Emissions                                      | EU-HR             | EP-HR                 | -     | -     | -     | -     | -     | -                | -     | -                     | 0.77     | 2.53 |
|   |                   | Total =               | 6.27  | 27.48 | 11.49 | 50.30 | 16.52 | 72.36            | 0.01  | 0.04                  | 1.07     | 3.82 |
|   | Total M           | linus Fugitives =     | 6.27  | 27.48 | 11.49 | 50.30 | 14.30 | 62.62            | 0.01  | 0.04                  | 0.30     | 1.30 |

Notes:

<sup>1</sup> Total VOC includes all constituents heavier than Propane (C3+), including hazardous air pollutants (HAP). Speciated HAP presented in following table.

#### SWN Production Company, LLC Thomas Parkinson Pad Summary of Hazardous Air Pollutants

|   |                   |              |          |         |              | Estimated Em      | issions (lb/hr) |          |         |         |           |
|---|-------------------|--------------|----------|---------|--------------|-------------------|-----------------|----------|---------|---------|-----------|
| Equipment   | Unit ID           | Acetaldehyde | Acrolein | Benzene | Ethylbenzene | Formalde-<br>hyde | Methanol        | n-Hexane | Toluene | Xylenes | Total HAP |
| 145-hp Caterpillar G3306 NA Engine                                | EU-ENG1           | <0.01        | <0.01    | <0.01   | <0.01        | 0.09              | <0.01           | -        | <0.01   | <0.01   | 0.10      |
| 145-hp Caterpillar G3306 NA Engine                                | EU-ENG2           | <0.01        | <0.01    | <0.01   | <0.01        | 0.09              | <0.01           | -        | <0.01   | <0.01   | 0.10      |
| 145-hp Caterpillar G3306 NA Engine                                | EU-ENG3           | <0.01        | <0.01    | <0.01   | <0.01        | 0.09              | <0.01           | -        | <0.01   | <0.01   | 0.10      |
| 203-hp Caterpillar G3306 TA Engine                                | EU-ENG4           | 0.01         | <0.01    | <0.01   | <0.01        | 0.11              | 0.01            | -        | <0.01   | <0.01   | 0.13      |
| 203-hp Caterpillar G3306 TA Engine                                | EU-ENG5           | 0.01         | <0.01    | <0.01   | <0.01        | 0.11              | 0.01            | -        | <0.01   | <0.01   | 0.13      |
| 92-hp GM Vortec 5.7L NA Engine                                    | EU-ENG6           | <0.01        | <0.01    | <0.01   | <0.01        | 0.02              | <0.01           | -        | <0.01   | <0.01   | 0.02      |
| 1.0-mmBtu/hr GPU Burner   | EU-GPU1           | -            | -        | <0.01   | -            | <0.01             | -               | <0.01    | <0.01   | -       | <0.01     |
| 1.0-mmBtu/hr GPU Burner   | EU-GPU2           | -            | -        | <0.01   | -            | <0.01             | -               | <0.01    | <0.01   | -       | <0.01     |
| 1.0-mmBtu/hr GPU Burner   | EU-GPU3           | -            | -        | <0.01   | -            | <0.01             | -               | <0.01    | <0.01   | -       | <0.01     |
| 1.0-mmBtu/hr GPU Burner   | EU-GPU4           | -            | -        | <0.01   | -            | <0.01             | -               | <0.01    | <0.01   | -       | <0.01     |
| 1.0-mmBtu/hr GPU Burner   | EU-GPU5           | -            | -        | <0.01   | -            | <0.01             | -               | <0.01    | <0.01   | -       | <0.01     |
| 1.5-mmBtu/hr Stabilizer Heater                                    | EU-SH1            | -            | -        | <0.01   | -            | <0.01             | -               | <0.01    | <0.01   | -       | <0.01     |
| 1.5-mmBtu/hr Stabilizer Heater                                    | EU-SH2            | -            | -        | <0.01   | -            | <0.01             | -               | <0.01    | <0.01   | -       | <0.01     |
| Six (6) 400-bbl Condensate Tanks Routed to Vapor Combustor        | EU-TANKS-<br>COND | -            | -        | -       | -            | -                 | -               | -        | -       | -       | -         |
| Six (6) 400-bbl Produced Water Tanks<br>Routed to Vapor Combustor | EU-TANKS-PW       | -            | -        | -       | -            | -                 | -               | -        | -       | -       | -         |
| Condensate Truck Loading w/ Vapor Return<br>Routed to Combustor   | EU-LOAD-<br>COND  | -            | -        | <0.01   | 0.02         | -                 | -               | 0.32     | 0.02    | 0.03    | 0.40      |
| Produced Water Truck Loading                                      | EU-LOAD-PW        | -            | -        | <0.01   | <0.01        | -                 | -               | <0.01    | <0.01   | <0.01   | 0.01      |
| 24.0-mmBtu/hr Vapor Combustor                                     | APC-COMB          | -            | -        | <0.01   | 0.03         | -                 | -               | 0.36     | 0.02    | 0.04    | 0.45      |
| Vapor Combustor Pilots  | EU-PILOTS         | -            | -        | <0.01   | -            | <0.01             | -               | <0.01    | <0.01   | -       | <0.01     |
| Fugitive Emissions  | EU-FUG            | -            | -        | <0.01   | 0.01         | -                 | -               | 0.09     | 0.01    | 0.01    | 0.11      |
| Fugitive Haul Road Emissions                                      | EU-HR             | -            | -        | -       | -            | -                 | -               | -        | -       | -       | -         |
|   | Total =           | 0.02         | 0.02     | 0.02    | 0.06         | 0.50              | 0.03            | 0.79     | 0.05    | 0.08    | 1.57      |

Continued on Next Page

#### SWN Production Company, LLC Thomas Parkinson Pad Summary of Hazardous Air Pollutants (Continued)

|   |                   |              |          | -       |              | Estimated En      | nissions (TPY) |          |         | -       |           |
|---|-------------------|--------------|----------|---------|--------------|-------------------|----------------|----------|---------|---------|-----------|
| Equipment   | Unit ID           | Acetaldehyde | Acrolein | Benzene | Ethylbenzene | Formalde-<br>hyde | Methanol       | n-Hexane | Toluene | Xylenes | Total HAP |
| 145-hp Caterpillar G3306 NA Engine                                | EU-ENG1           | 0.02         | 0.01     | 0.01    | <0.01        | 0.38              | 0.02           | -        | <0.01   | <0.01   | 0.44      |
| 145-hp Caterpillar G3306 NA Engine                                | EU-ENG2           | 0.02         | 0.01     | 0.01    | <0.01        | 0.38              | 0.02           | -        | <0.01   | <0.01   | 0.44      |
| 145-hp Caterpillar G3306 NA Engine                                | EU-ENG3           | 0.02         | 0.01     | 0.01    | <0.01        | 0.38              | 0.02           | -        | <0.01   | <0.01   | 0.44      |
| 203-hp Caterpillar G3306 TA Engine                                | EU-ENG4           | 0.02         | 0.02     | 0.01    | <0.01        | 0.49              | 0.02           | -        | <0.01   | <0.01   | 0.58      |
| 203-hp Caterpillar G3306 TA Engine                                | EU-ENG5           | 0.02         | 0.02     | 0.01    | <0.01        | 0.49              | 0.02           | -        | <0.01   | <0.01   | 0.58      |
| 92-hp GM Vortec 5.7L NA Engine                                    | EU-ENG6           | 0.01         | 0.01     | 0.01    | <0.01        | 0.07              | 0.01           | -        | <0.01   | <0.01   | 0.11      |
| 1.0-mmBtu/hr GPU Burner   | EU-GPU1           | -            | -        | <0.01   | -            | <0.01             | -              | 0.01     | <0.01   | -       | 0.01      |
| 1.0-mmBtu/hr GPU Burner   | EU-GPU2           | -            | -        | <0.01   | -            | <0.01             | -              | 0.01     | <0.01   | -       | 0.01      |
| 1.0-mmBtu/hr GPU Burner   | EU-GPU3           | -            | -        | <0.01   | -            | <0.01             | -              | 0.01     | <0.01   | -       | 0.01      |
| 1.0-mmBtu/hr GPU Burner   | EU-GPU4           | -            | -        | <0.01   | -            | <0.01             | -              | 0.01     | <0.01   | -       | 0.01      |
| 1.0-mmBtu/hr GPU Burner   | EU-GPU5           | -            | -        | <0.01   | -            | <0.01             | -              | 0.01     | <0.01   | -       | 0.01      |
| 1.5-mmBtu/hr Stabilizer Heater                                    | EU-SH1            | -            | -        | <0.01   | -            | <0.01             | -              | 0.01     | <0.01   | -       | 0.01      |
| 1.5-mmBtu/hr Stabilizer Heater                                    | EU-SH2            | -            | -        | <0.01   | -            | <0.01             | -              | 0.01     | <0.01   | -       | 0.01      |
| Six (6) 400-bbl Condensate Tanks Routed to Vapor Combustor        | EU-TANKS-<br>COND | -            | -        | -       | -            | -                 | -              | -        | -       | -       | -         |
| Six (6) 400-bbl Produced Water Tanks<br>Routed to Vapor Combustor | EU-TANKS-PW       | -            | -        | -       | -            | -                 | -              | -        | -       | -       | -         |
| Condensate Truck Loading w/ Vapor Return<br>Routed to Combustor   | EU-LOAD-<br>COND  | -            | -        | 0.02    | 0.10         | -                 | -              | 1.39     | 0.08    | 0.15    | 1.74      |
| Produced Water Truck Loading                                      | EU-LOAD-PW        | -            | -        | <0.01   | <0.01        | -                 | -              | 0.02     | <0.01   | <0.01   | 0.03      |
| 24.0-mmBtu/hr Vapor Combustor                                     | APC-COMB          | -            | -        | 0.02    | 0.11         | -                 | -              | 1.58     | 0.10    | 0.17    | 1.97      |
| Vapor Combustor Pilots  | EU-PILOTS         | -            | -        | <0.01   | -            | <0.01             | -              | <0.01    | <0.01   | -       | <0.01     |
| Fugitive Emissions  | EU-FUG            | -            | -        | <0.01   | 0.03         | -                 | -              | 0.39     | 0.02    | 0.04    | 0.48      |
| Fugitive Haul Road Emissions                                      | EU-HR             | -            | -        | -       | -            | -                 | -              | -        | -       | -       | -         |
|   | Total =           | 0.10         | 0.09     | 0.10    | 0.24         | 2.19              | 0.11           | 3.45     | 0.22    | 0.36    | 6.87      |

#### SWN Production Company, LLC Thomas Parkinson Pad Summary of Greenhouse Gas Emissions - Metric Tons per Year (Tonnes)

| Fauinment   | Unit ID           | Carbon Di | oxide (CO <sub>2</sub> ) | Metha | ne (CH <sub>4</sub> ) | Methane (C | CH <sub>4</sub> ) as CO <sub>2 Eq.</sub> | Nitrous C | Dxide (N <sub>2</sub> O) | Nitrous Oxide | (N <sub>2</sub> O) as CO <sub>2 Eq.</sub> | Total CO | 2 + CO <sub>2 Eq.</sub> <sup>1</sup> |
|---|-------------------|-----------|--------------------------|-------|-----------------------|------------|--|-----------|--------------------------|---------------|---|----------|--------------------------------------|
| 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                                | 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                                | 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                               |
| 145-hp Caterpillar G3306 NA Engine                                | EU-ENG3           | 155.04    | 616.04                   | <0.01 | 0.01                  | 0.07       | 0.27                                     | <0.01     | <0.01                    | 0.08          | 0.33                                      | 155.19   | 616.64                               |
| 203-hp Caterpillar G3306 TA Engine                                | EU-ENG4           | 217.05    | 862.45                   | <0.01 | 0.02                  | 0.10       | 0.40                                     | <0.01     | <0.01                    | 0.12          | 0.48                                      | 217.27   | 863.33                               |
| 203-hp Caterpillar G3306 TA Engine                                | EU-ENG5           | 217.05    | 862.45                   | <0.01 | 0.02                  | 0.10       | 0.40                                     | <0.01     | <0.01                    | 0.12          | 0.48                                      | 217.27   | 863.33                               |
| 92-hp GM Vortec 5.7L NA Engine                                    | EU-ENG6           | 91.48     | 363.48                   | <0.01 | 0.01                  | 0.04       | 0.17                                     | <0.01     | <0.01                    | 0.05          | 0.20                                      | 91.57    | 363.85                               |
| 1.0-mmBtu/hr GPU Burner   | EU-GPU1           | 116.98    | 464.80                   | <0.01 | 0.01                  | 0.06       | 0.22                                     | <0.01     | <0.01                    | 0.07          | 0.26                                      | 117.10   | 465.28                               |
| 1.0-mmBtu/hr GPU Burner   | EU-GPU2           | 116.98    | 464.80                   | <0.01 | 0.01                  | 0.06       | 0.22                                     | <0.01     | <0.01                    | 0.07          | 0.26                                      | 117.10   | 465.28                               |
| 1.0-mmBtu/hr GPU Burner   | EU-GPU3           | 116.98    | 464.80                   | <0.01 | 0.01                  | 0.06       | 0.22                                     | <0.01     | <0.01                    | 0.07          | 0.26                                      | 117.10   | 465.28                               |
| 1.0-mmBtu/hr GPU Burner   | EU-GPU4           | 116.98    | 464.80                   | <0.01 | 0.01                  | 0.06       | 0.22                                     | <0.01     | <0.01                    | 0.07          | 0.26                                      | 117.10   | 465.28                               |
| 1.0-mmBtu/hr GPU Burner   | EU-GPU5           | 116.98    | 464.80                   | <0.01 | 0.01                  | 0.06       | 0.22                                     | <0.01     | <0.01                    | 0.07          | 0.26                                      | 117.10   | 465.28                               |
| 1.5-mmBtu/hr Stabilizer Heater                                    | EU-SH1            | 175.47    | 697.21                   | <0.01 | 0.01                  | 0.08       | 0.33                                     | <0.01     | <0.01                    | 0.10          | 0.39                                      | 175.65   | 697.93                               |
| 1.5-mmBtu/hr Stabilizer Heater                                    | EU-SH2            | 175.47    | 697.21                   | <0.01 | 0.01                  | 0.08       | 0.33                                     | <0.01     | <0.01                    | 0.10          | 0.39                                      | 175.65   | 697.93                               |
| Six (6) 400-bbl Condensate Tanks Routed to Vapor Combustor        | EU-TANKS-<br>COND | -         | -                        | -     | -                     | -          | -  | -         | -                        | -             | -   | -        | -                                    |
| Six (6) 400-bbl Produced Water Tanks<br>Routed to Vapor Combustor | EU-TANKS-PW       | -         | -                        | -     | -                     | -          | -  | -         | -                        | -             | -   | -        | -                                    |
| Condensate Truck Loading w/ Vapor Return<br>Routed to Combustor   | EU-LOAD-COND      | <0.01     | 0.01                     | 0.73  | 2.89                  | 18.19      | 72.27                                    | -         | -                        | -             | -   | 18.19    | 72.28                                |
| Produced Water Truck Loading                                      | EU-LOAD-PW        | 0.02      | 0.07                     | 3.25  | 12.92                 | 81.31      | 323.08                                   | -         | -                        | -             | -   | 81.32    | 323.14                               |
| 24.0-mmBtu/hr Vapor Combustor                                     | APC-COMB          | 2,807.45  | 11,155.31                | 0.05  | 0.21                  | 1.32       | 5.26                                     | 0.01      | 0.02                     | 1.58          | 6.27                                      | 2,810.35 | 11,166.83                            |
| Vapor Combustor Pilots  | EU-PILOTS         | 21.17     | 84.13                    | <0.01 | <0.01                 | 0.01       | 0.04                                     | <0.01     | <0.01                    | 0.01          | 0.05                                      | 21.19    | 84.22                                |
| Fugitive Emissions  | EU-FUG            | 0.01      | 0.03                     | 1.64  | 6.50                  | 40.89      | 162.46                                   | -         | -                        | -             | -   | 40.90    | 162.50                               |
| Fugitive Haul Road Emissions                                      | EU-HR             | -         | -                        | -     | -                     |            | -  | -         | -                        | -             | -   | -        | -                                    |
|   | Total =           | 4,755.16  | 18,894.48                | 5.70  | 22.67                 | 142.61     | 566.65                                   | 0.01      | 0.04                     | 2.65          | 10.54                                     | 4,900.42 | 19,471.67                            |

Notes:

<sup>1</sup> CO<sub>2</sub> Equivalent = Pollutant times GWP multiplier. 40 CFR 98 Table A-1, Global Warming Potential (GWP) multiplier (100-Year Time Horizon): CO<sub>2</sub> = 1, CH<sub>4</sub> = 25, N<sub>2</sub>O = 298

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

#### SWN Production Company, LLC Thomas Parkinson Pad Summary of Greenhouse Gas Emissions - Short Tons per Year (Tons)

| Eminment  | Unit ID           | Carbon Die | 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 | 2 + CO <sub>2 Eq.</sub> <sup>1</sup> |
|---|-------------------|------------|--------------------------|--------|-----------------------|------------|---|-----------|-------------------------|---------------|---|----------|--------------------------------------|
| Equipment   | UNITID            | lb/hr      | tons/yr <sup>2</sup>     | lb/hr  | tons/yr <sup>2</sup>  | lb/hr      | tons/yr                                 | lb/hr     | tons/yr <sup>2</sup>    | lb/hr         | tons/yr                                   | lb/hr    | tons/yr                              |
| 145-hp Caterpillar G3306 NA Engine                                | 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                                | 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                               |
| 145-hp Caterpillar G3306 NA Engine                                | EU-ENG3           | 155.04     | 679.06                   | <0.01  | 0.01                  | 0.07       | 0.30                                    | <0.01     | <0.01                   | 0.08          | 0.36                                      | 155.19   | 679.73                               |
| 203-hp Caterpillar G3306 TA Engine                                | EU-ENG4           | 217.05     | 950.69                   | <0.01  | 0.02                  | 0.10       | 0.44                                    | <0.01     | <0.01                   | 0.12          | 0.53                                      | 217.27   | 951.66                               |
| 203-hp Caterpillar G3306 TA Engine                                | EU-ENG5           | 217.05     | 950.69                   | <0.01  | 0.02                  | 0.10       | 0.44                                    | <0.01     | <0.01                   | 0.12          | 0.53                                      | 217.27   | 951.66                               |
| 92-hp GM Vortec 5.7L NA Engine                                    | EU-ENG6           | 91.48      | 400.67                   | <0.01  | 0.01                  | 0.04       | 0.19                                    | <0.01     | <0.01                   | 0.05          | 0.23                                      | 91.57    | 401.08                               |
| 1.0-mmBtu/hr GPU Burner   | EU-GPU1           | 116.98     | 512.36                   | <0.01  | 0.01                  | 0.06       | 0.24                                    | <0.01     | <0.01                   | 0.07          | 0.29                                      | 117.10   | 512.89                               |
| 1.0-mmBtu/hr GPU Burner   | EU-GPU2           | 116.98     | 512.36                   | <0.01  | 0.01                  | 0.06       | 0.24                                    | <0.01     | <0.01                   | 0.07          | 0.29                                      | 117.10   | 512.89                               |
| 1.0-mmBtu/hr GPU Burner   | EU-GPU3           | 116.98     | 512.36                   | <0.01  | 0.01                  | 0.06       | 0.24                                    | <0.01     | <0.01                   | 0.07          | 0.29                                      | 117.10   | 512.89                               |
| 1.0-mmBtu/hr GPU Burner   | EU-GPU4           | 116.98     | 512.36                   | <0.01  | 0.01                  | 0.06       | 0.24                                    | <0.01     | <0.01                   | 0.07          | 0.29                                      | 117.10   | 512.89                               |
| 1.0-mmBtu/hr GPU Burner   | EU-GPU5           | 116.98     | 512.36                   | <0.01  | 0.01                  | 0.06       | 0.24                                    | <0.01     | <0.01                   | 0.07          | 0.29                                      | 117.10   | 512.89                               |
| 1.5-mmBtu/hr Stabilizer Heater                                    | EU-SH1            | 175.47     | 768.54                   | <0.01  | 0.01                  | 0.08       | 0.36                                    | <0.01     | <0.01                   | 0.10          | 0.43                                      | 175.65   | 769.33                               |
| 1.5-mmBtu/hr Stabilizer Heater                                    | EU-SH2            | 175.47     | 768.54                   | <0.01  | 0.01                  | 0.08       | 0.36                                    | <0.01     | <0.01                   | 0.10          | 0.43                                      | 175.65   | 769.33                               |
| Six (6) 400-bbl Condensate Tanks Routed to Vapor Combustor        | EU-TANKS-<br>COND | -          | -                        |        |                       | -          | -                                       | -         |                         | -             | -   | -        |                                      |
| Six (6) 400-bbl Produced Water Tanks<br>Routed to Vapor Combustor | EU-TANKS-PW       | -          | -                        |        |                       | -          | -                                       | -         |                         | -             | -   | -        |                                      |
| Condensate Truck Loading w/ Vapor Return<br>Routed to Combustor   | EU-LOAD-COND      | <0.01      | 0.02                     | 0.73   | 3.19                  | 18.19      | 79.66                                   | -         | -                       | -             | -   | 18.19    | 79.68                                |
| Produced Water Truck Loading                                      | EU-LOAD-PW        | 0.02       | 0.07                     | 3.25   | 14.25                 | 81.31      | 356.13                                  | -         | -                       | -             | -   | 81.32    | 356.20                               |
| 24.0-mmBtu/hr Vapor Combustor                                     | APC-COMB          | 2,807.45   | 12,296.63                | 0.05   | 0.23                  | 1.32       | 5.79                                    | 0.01      | 0.02                    | 1.58          | 6.91                                      | 2,810.35 | 12,309.33                            |
| Vapor Combustor Pilots  | EU-PILOTS         | 21.17      | 92.74                    | <0.01  | <0.01                 | 0.01       | 0.04                                    | <0.01     | <0.01                   | 0.01          | 0.05                                      | 21.19    | 92.83                                |
| Fugitive Emissions  | EU-FUG            | 0.01       | 0.04                     | 1.64   | 7.16                  | 40.89      | 179.09                                  | -         | -                       | -             | -   | 40.90    | 179.12                               |
| Fugitive Haul Road Emissions                                      | EU-HR             | -          | -                        | -      | -                     | -          | -                                       | -         | -                       | -             | -   | -        | -                                    |
|   | Total =           | 4,755.16   | 20,827.60                | 5.70   | 24.99                 | 142.61     | 624.63                                  | 0.01      | 0.04                    | 2.65          | 11.62                                     | 4,900.42 | 21,463.84                            |

Notes:

<sup>1</sup> CO<sub>2</sub> Equivalent = Pollutant times GWP multiplier. 40 CFR 98 Table A-1, Global Warming Potential (GWP) multiplier (100-Year Time Horizon): CO<sub>2</sub> = 1, CH<sub>4</sub> = 25, N<sub>2</sub>O = 298

<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>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 (flashing is controlled by the vapor combustor in this case), working and breathing loss emissions of these gases are very small in production and virtually nonexistent in the downstream segments. Vapors from the tanks are routed to the vapor combustor at this site. Therefore, GHG emissions from the tanks are assumed to be negligible.

#### SWN Production Company, LLC Thomas Parkinson Pad Engine Emissions Calculations - Criteria Air Pollutants

#### Equipment Information

| Unit ID:<br>Emission Point ID:              |            | ENG1<br>ENG1 |             | ENG2    | <u>EU-E</u><br>EP-E |             |             | NG4     |             | ENG5<br>ING5 |             | NG6   |
|---|------------|--------------|-------------|---------|---------------------|-------------|-------------|---------|-------------|--------------|-------------|-------|
| Make:                                       |            | rpillar      |             | rpillar | Cater               |             |             | rpillar |             | rpillar      |             | M     |
| Model:                                      |            | D6 NA        | G330        |         |                     | 6 NA        |             | 6 TA    |             | 06 TA        | Vortec      |       |
| Design Class:                               | 4S         | -RB          | 4S-RB 4S-RB |         | 4S-                 | 4S-RB 4S-RB |             | -RB     | 4S-RB       |              |             |       |
| Controls:                                   |            | SCR          | NS          | CR      | NS                  | CR          | NS          | CR      | NS          | CR           | NS          | CR    |
| Horsepower (hp):                            | 1.         | 45           | 14          | 45      | 14                  | 45          | 20          | 03      | 2           | 03           | 92          | 2.0   |
| Fuel Use (Btu/hp-hr):                       |            | 625          |             | 625     | 8,6                 |             |             | )15     |             | 015          | 8,5         |       |
| Fuel Use (scfh):                            |            | 382          | 1,3         | 382     | 1,3                 | 882         | 2,0         | )22     |             | )22          |             | 64    |
| Annual Fuel Use (mmscf):                    |            | 11           |             | .11     | 12                  |             | 17          |         |             | .71          | 7.          |       |
| Fuel Use (mmBtu/hr):                        |            | .25          | 1.          |         |                     | 25          | 1.          |         |             | 83           | 0.          |       |
| Exhaust Flow (acfm):                        |            | 78           |             | 78      | 67                  |             | ,           | 002     |             | 002          |             | 50    |
| Exhaust Temp (°F):                          |            | 101          |             | 101     | 1,1                 |             |             | 96      |             | 96           | 1,2         |       |
| Manufacture Date:                           |            | /1/2011      | after 1/    |         | after 1/            |             | after 1/    |         |             | /1/2011      | after 7/    |       |
| Operating Hours:                            |            | 760          |             | 760     | 8,7                 |             |             | 760     |             | 760          |             | 60    |
| Fuel Heating Value (Btu/scf):               | 9          | 05           | 90          | 05      | 90                  | 05          | 90          | 05      | 90          | 05           | 90          | 05    |
| Uncontrolled Manufacturer Emission Factor   |            |              |             |         |                     |             |             |         |             |              |             |       |
| NOx (g/hp-hr):                              |            | 13.47        |             | .47     | 13.47               |             | 15.79       |         | 15.79       |              | 14.00       |       |
| CO (g/hp-hr):                               |            | .47          | 13.47       |         |                     | 13.47 15.79 |             |         | 15.79       |              | 11.00       |       |
| NMNEHC/VOC (g/hp-hr):                       |            | 22           | 0.22        |         |                     | 0.22 0.26   |             |         | 0.26        |              | 0.40        |       |
| Total VOC = NMNEHC + HCHO (g/hp-hr):        | 0.         | 49           | 0.49 0.49   |         | 0.                  | 51          | 0.          | 51      | N           | A            |             |       |
| Post-Catalyst Emission Factors              |            | 500/         |             | -00/    |                     | -00/        |             |         |             |              |             | 2004  |
| NOx Control Eff. %                          |            | 58%          |             | 58%     | 92.5                |             |             | 67%     |             | 67%          | 92.8        |       |
| CO Control Eff. %                           | 85.        | 15%          | 85.         | 15%     | 85.                 | 15%         | 87          | 33%     | 87          | 33%          | 81.8        | 32%   |
| NOx (g/hp-hr):                              | 1.         | .00          | 1.          | 00      | 1.                  | 00          | 1.          | 00      | 1.          | 00           | 1.          | 00    |
| CO (g/hp-hr):                               | 2.         | .00          | 2.          | 00      | 2.00                |             | 2.00        |         | 2.00        |              | 2.00        |       |
| NMNEHC/VOC (g/hp-hr):                       | 0.         | 22           | 0.          | 22      | 0.22                |             | 0.26        |         | 0.          | 26           | 0.40        |       |
| Total VOC = NMNEHC + HCHO (g/hp-hr):        | 0.         | 49           | 0.          | 49      | 0.                  | 49          | 0.51        |         | 0.          | 51           | N           | A     |
| Uncontrolled Criteria Air Pollutant Emissic | ons        |              |             |         |                     |             |             |         |             |              |             |       |
| Unit ID:                                    | <u>EU-</u> | ENG1         | <u>EU-E</u> | NG2     | EU-E                | NG3         | <u>EU-E</u> | NG4     | <u>EU-E</u> | NG5          | <u>EU-E</u> | NG6   |
| Pollutant                                   | lb/hr      | TPY          | lb/hr       | TPY     | lb/hr               | TPY         | lb/hr       | TPY     | lb/hr       | TPY          | lb/hr       | TPY   |
| NOx   | 4.31       | 18.86        | 4.31        | 18.86   | 4.31                | 18.86       | 7.07        | 30.95   | 7.07        | 30.95        | 2.84        | 12.44 |
| CO  | 4.31       | 18.86        | 4.31        | 18.86   | 4.31                | 18.86       | 7.07        | 30.95   | 7.07        | 30.95        | 2.23        | 9.77  |
| NMNEHC/VOC (does not include HCHO)          | 0.07       | 0.31         | 0.07        | 0.31    | 0.07                | 0.31        | 0.12        | 0.51    | 0.12        | 0.51         | 0.08        | 0.36  |
| Total VOC (includes HCHO)                   | 0.16       | 0.69         | 0.16        | 0.69    | 0.16                | 0.69        | 0.23        | 1.00    | 0.23        | 1.00         | 0.10        | 0.43  |
| SO <sub>2</sub>                             | <0.01      | <0.01        | <0.01       | <0.01   | <0.01               | <0.01       | <0.01       | <0.01   | <0.01       | <0.01        | <0.01       | <0.01 |
| PM <sub>10/2.5</sub>                        | 0.01       | 0.05         | 0.01        | 0.05    | 0.01                | 0.05        | 0.02        | 0.08    | 0.02        | 0.08         | 0.01        | 0.03  |
| PM <sub>COND</sub>                          | 0.01       | 0.05         | 0.01        | 0.05    | 0.01                | 0.05        | 0.02        | 0.08    | 0.02        | 0.08         | 0.01        | 0.03  |

PM<sub>TOT</sub>

0.02

0.11

0.02

0.11

0.02

0.11

0.04

0.16

0.04

0.16

0.02

0.07

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

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

| Pollutant                          | lb/hr | TPY   |
|------------------------------------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
| NOx                                | 0.32  | 1.40  | 0.32  | 1.40  | 0.32  | 1.40  | 0.45  | 1.96  | 0.45  | 1.96  | 0.20  | 0.89  |
| CO                                 | 0.64  | 2.80  | 0.64  | 2.80  | 0.64  | 2.80  | 0.90  | 3.92  | 0.90  | 3.92  | 0.41  | 1.78  |
| NMNEHC/VOC (does not include HCHO) | 0.07  | 0.31  | 0.07  | 0.31  | 0.07  | 0.31  | 0.12  | 0.51  | 0.12  | 0.51  | 0.08  | 0.36  |
| Total VOC (includes HCHO)          | 0.16  | 0.69  | 0.16  | 0.69  | 0.16  | 0.69  | 0.23  | 1.00  | 0.23  | 1.00  | 0.10  | 0.43  |
| NMHC + NOx as VOC                  | NA    |
| SO <sub>2</sub>                    | <0.01 | <0.01 | <0.01 | <0.01 | <0.01 | <0.01 | <0.01 | <0.01 | <0.01 | <0.01 | <0.01 | <0.01 |
| PM <sub>10/2.5</sub>               | 0.01  | 0.05  | 0.01  | 0.05  | 0.01  | 0.05  | 0.02  | 0.08  | 0.02  | 0.08  | 0.01  | 0.03  |
| PM <sub>COND</sub>                 | 0.01  | 0.05  | 0.01  | 0.05  | 0.01  | 0.05  | 0.02  | 0.08  | 0.02  | 0.08  | 0.01  | 0.03  |
| PM <sub>TOT</sub>                  | 0.02  | 0.11  | 0.02  | 0.11  | 0.02  | 0.11  | 0.04  | 0.16  | 0.04  | 0.16  | 0.02  | 0.07  |

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

<u>4S-RB</u>

| 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     |

Notes:

<sup>1</sup> Uncontrolled emission factors based on engine manufacturer data. Per Caterpillar, NMNEHC emission factor does not include formaldehyde (HCHO); therefore, NMNEHC and HCHO factors have been added to demonstrate total uncontrolled VOC. All other pollutants calculated using AP-42.

<sup>2</sup> Post-catalyst emission factors for the Caterpillar engines are 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>3</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 Thomas Parkinson Pad Engine Emissions Calculations - Hazardous Air Pollutants

#### Equipment Information

| Unit ID:                 | EU-ENG1     | EU-ENG2     | EU-ENG3     | EU-ENG4     | EU-ENG5     | EU-ENG6        |
|--------------------------|-------------|-------------|-------------|-------------|-------------|----------------|
| Emission Point ID:       | EP-ENG1     | EP-ENG2     | EP-ENG3     | EP-ENG4     | EP-ENG5     | EP-ENG6        |
| Make:                    | Caterpillar | Caterpillar | Caterpillar | Caterpillar | Caterpillar | GM             |
| Model:                   | G3306 NA    | G3306 NA    | G3306 NA    | G3306 TA    | G3306 TA    | Vortec 5.7L NA |
| Design Class:            | 4S-RB       | 4S-RB       | 4S-RB       | 4S-RB       | 4S-RB       | 4S-RB          |
| Controls:                | NSCR        | NSCR        | NSCR        | NSCR        | NSCR        | NSCR           |
| Horsepower (hp):         | 145         | 145.0       | 145.0       | 203         | 203         | 92.0           |
| Fuel Use (Btu/hp-hr):    | 8,625       | 8,625       | 8,625       | 9,015       | 9,015       | 8,500          |
| Fuel Use (scfh):         | 1,382       | 1,382       | 1,382       | 2,022       | 2,022       | 864            |
| Annual Fuel Use (mmscf): | 12.11       | 12.11       | 12.11       | 17.71       | 17.71       | 7.57           |
| Fuel Use (mmBtu/hr):     | 1.25        | 1.25        | 1.25        | 1.83        | 1.83        | 0.78           |
| Exhaust Flow (acfm):     | 678         | 678         | 678         | 1,002       | 1,002       | 650            |
| Exhaust Temp (°F):       | 1,101       | 1,101       | 1,101       | 1,096       | 1,096       | 1,200          |
| Operating Hours:         | 8,760       | 8,760       | 8,760       | 8,760       | 8,760       | 8,760          |

#### Proposed HAP Emissions<sup>1,2</sup>

| Unit ID:     | <u>EU-E</u> | NG1   | <u>EU-</u> | ENG2  | <u>EU-E</u> | NG3   | <u>EU-</u> | ENG4  | <u>EU-</u> | ENG5  | <u>EU-</u> | ENG6  |
|--------------|-------------|-------|------------|-------|-------------|-------|------------|-------|------------|-------|------------|-------|
| Pollutant    | lb/hr       | TPY   | lb/hr      | TPY   | lb/hr       | TPY   | lb/hr      | TPY   | lb/hr      | TPY   | lb/hr      | TPY   |
| Acetaldehyde | <0.01       | 0.02  | <0.01      | 0.02  | <0.01       | 0.02  | 0.01       | 0.02  | 0.01       | 0.02  | <0.01      | 0.01  |
| Acrolein     | <0.01       | 0.01  | <0.01      | 0.01  | <0.01       | 0.01  | <0.01      | 0.02  | <0.01      | 0.02  | <0.01      | 0.01  |
| Benzene      | <0.01       | 0.01  | <0.01      | 0.01  | <0.01       | 0.01  | <0.01      | 0.01  | <0.01      | 0.01  | <0.01      | 0.01  |
| Ethylbenzene | <0.01       | <0.01 | <0.01      | <0.01 | <0.01       | <0.01 | <0.01      | <0.01 | <0.01      | <0.01 | <0.01      | <0.01 |
| Formaldehyde | 0.09        | 0.38  | 0.09       | 0.38  | 0.09        | 0.38  | 0.11       | 0.49  | 0.11       | 0.49  | 0.02       | 0.07  |
| Methanol     | <0.01       | 0.02  | <0.01      | 0.02  | <0.01       | 0.02  | 0.01       | 0.02  | 0.01       | 0.02  | <0.01      | 0.01  |
| Toluene      | <0.01       | <0.01 | <0.01      | <0.01 | <0.01       | <0.01 | <0.01      | <0.01 | <0.01      | <0.01 | <0.01      | <0.01 |
| Xylenes      | <0.01       | <0.01 | <0.01      | <0.01 | <0.01       | <0.01 | <0.01      | <0.01 | <0.01      | <0.01 | <0.01      | <0.01 |
| Total HAP =  | 0.10        | 0.44  | 0.10       | 0.44  | 0.10        | 0.44  | 0.13       | 0.58  | 0.13       | 0.58  | 0.02       | 0.11  |

SWN Production Company, LLC Thomas Parkinson Pad Engine Emissions Calculations - Hazardous Air Pollutants (Continued)

#### 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     |

Notes:

<sup>1</sup> Manuf. data for uncontrolled Caterpillar G3306 NA HCHO emissions (g/hp-hr): 0.27 Manuf. data for uncontrolled Caterpillar G3306 TA HCHO emissions (g/hp-hr): 0.25 Manuf. Data for uncontrolled GM Vortec 5.7L NA HCHO emissions (g/hp-hr): NA

<sup>2</sup> For conservative estimate, no reduction taken for any HAP .

#### SWN Production Company, LLC Thomas Parkinson Pad Engine Emissions Calculations - Greenhouse Gases

#### Equipment Information

| Unit ID:   | EU-ENG1     | EU-ENG2     | EU-ENG3     | EU-ENG4     | EU-ENG5     | EU-ENG6        |
|--|-------------|-------------|-------------|-------------|-------------|----------------|
| Emission Point ID:                                   | EP-ENG1     | EP-ENG2     | EP-ENG3     | EP-ENG4     | EP-ENG5     | EP-ENG6        |
| Make:  | Caterpillar | Caterpillar | Caterpillar | Caterpillar | Caterpillar | GM             |
| Model:   | G3306 NA    | G3306 NA    | G3306 NA    | G3306 TA    | G3306 TA    | Vortec 5.7L NA |
| Design Class:  | 4S-RB       | 4S-RB       | 4S-RB       | 4S-RB       | 4S-RB       | 4S-RB          |
| Controls:  | NSCR        | NSCR        | NSCR        | NSCR        | NSCR        | NSCR           |
| Horsepower (hp):                                     | 145         | 145.0       | 145.0       | 203         | 203         | 92.0           |
| Capacity (kW):                                       | NA          | NA          | NA          | NA          | NA          | NA             |
| Fuel Use (Btu/hp-hr):                                | 8,625       | 8,625       | 8,625       | 9,015       | 9,015       | 8,500          |
| Fuel Use (Btu/kW-hr):                                | NA          | NA          | NA          | NA          | NA          | NA             |
| Fuel Use (scfh):                                     | 1,382       | 1,382       | 1,382       | 2,022       | 2,022       | 864            |
| Fuel Use (mmBtu/hr):                                 | 1.25        | 1.25        | 1.25        | 1.83        | 1.83        | 0.78           |
| Exhaust Flow (acfm):                                 | 678         | 678         | 678         | 1,002       | 1,002       | 650            |
| Exhaust Temp (°F):                                   | 1,101       | 1,101       | 1,101       | 1,096       | 1,096       | 1,200          |
| Operating Hours:                                     | 8,760       | 8,760       | 8,760       | 8,760       | 8,760       | 8,760          |
|  |             |             |             |             |             |                |
| Manufacturer Emission Factors (g/hp-hr) <sup>1</sup> |             |             |             |             |             |                |
| CO <sub>2</sub> =                                    | 485         | 485         | 485         | 569         | 569         | NA             |

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

| Unit ID:                                    | <u>EU-</u> | ENG1      | <u>EU-I</u> | ENG2      | <u>EU-I</u> | ENG3      | <u>EU-I</u> | ENG4      | <u>EU-I</u> | ENG5      | <u>EU-I</u> | ENG6      |
|---|------------|-----------|-------------|-----------|-------------|-----------|-------------|-----------|-------------|-----------|-------------|-----------|
| Pollutant                                   | lb/hr      | tonnes/yr | lb/hr       | tonnes/yr | lb/hr       | tonnes/yr | lb/hr       | tonnes/yr | lb/hr       | tonnes/yr | lb/hr       | tonnes/yr |
| CO <sub>2</sub>                             | 155.04     | 616.04    | 155.04      | 616.04    | 155.04      | 616.04    | 217.05      | 862.45    | 217.05      | 862.45    | 91.48       | 363.48    |
| CH <sub>4</sub>                             | <0.01      | 0.01      | <0.01       | 0.01      | <0.01       | 0.01      | <0.01       | 0.02      | <0.01       | 0.02      | <0.01       | 0.01      |
| N <sub>2</sub> O                            | <0.01      | <0.01     | <0.01       | <0.01     | <0.01       | <0.01     | <0.01       | <0.01     | <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      | 0.07        | 0.27      | 0.10        | 0.40      | 0.10        | 0.40      | 0.04        | 0.17      |
| N <sub>2</sub> O as CO <sub>2</sub> e       | 0.08       | 0.33      | 0.08        | 0.33      | 0.08        | 0.33      | 0.12        | 0.48      | 0.12        | 0.48      | 0.05        | 0.20      |
| Total CO <sub>2</sub> + CO <sub>2</sub> e = | 155.19     | 616.64    | 155.19      | 616.64    | 155.19      | 616.64    | 217.27      | 863.33    | 217.27      | 863.33    | 91.57       | 363.85    |

#### 40 CFR 98 Tables ENG-1 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 |

Notes:

<sup>1</sup> Caterpillar <sup>m</sup>anufacturer data used to estimate CO<sub>2</sub> emissions for the Caterpillar engine. All other emissions estimated using EPA data. Conversion to short tons (tons) found in sitewide Summary of Greenhouse Gases - Short Tons per Year (tons) table.

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

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

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

#### **Equipment Information**

| Unit ID:                  | <u>EU-GPU1 - EU-GPU5 (EACH)</u> |
|---------------------------|---------------------------------|
| Emission Point ID:        | EP-GPU1 - EP-GPU5               |
| Description:              | Gas Production Unit Burner      |
| Number of Units:          | 5                               |
| 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-GPU5 (EACH)</u>

| Pollutant            | lb/hr | TPY   |
|----------------------|-------|-------|
| NOx                  | 0.11  | 0.48  |
| CO                   | 0.09  | 0.41  |
| VOC                  | 0.01  | 0.03  |
| SO <sub>2</sub>      | <0.01 | <0.01 |
| PM <sub>10/2.5</sub> | 0.01  | 0.03  |
| PM <sub>COND</sub>   | <0.01 | 0.01  |
| PM <sub>TOT</sub>    | 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              |

Notes:

<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 Thomas Parkinson Pad Gas Production Unit Burner Emissions Calculations - Hazardous Air Pollutants

### **Equipment Information**

| Unit ID:                  | <u>EU-GPU1 - EU-GPU5 (EACH)</u> |  |  |
|---------------------------|---------------------------------|--|--|
| Emission Point ID:        | EP-GPU1 - EP-GPU5               |  |  |
| Description:              | Gas Production Unit Burner      |  |  |
| Number of Units:          | 5                               |  |  |
| Burner Design (mmBtu/hr): | 1.0                             |  |  |
| Fuel HHV (Btu/scf):       | 905                             |  |  |
| Annual Fuel Use (mmscf):  | 9.68                            |  |  |
| Annual Operating Hours:   | 8,760                           |  |  |

#### Hazardous Air Pollutant Emissions

Unit ID:

EU-GPU1 - EU-GPU5 (EACH)

| Pollutant    | lb/hr | ТРҮ   |
|--------------|-------|-------|
| n-Hexane     | <0.01 | 0.01  |
| Formaldehyde | <0.01 | <0.01 |
| Benzene      | <0.01 | <0.01 |
| Toluene      | <0.01 | <0.01 |
| Total HAP =  | <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 Thomas Parkinson Pad Gas Production Unit Burner Emissions Calculations - Greenhouse Gases

#### **Equipment Information**

| Unit ID:                  | <u>EU-GPU1 - EU-GPU5 (EACH)</u> |  |  |
|---------------------------|---------------------------------|--|--|
| Emission Point ID:        | EP-GPU1 - EP-GPU5               |  |  |
| Description:              | Gas Production Unit Burner      |  |  |
| Number of Units:          | 5                               |  |  |
| 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:

EU-GPU1 - EU-GPU5 (EACH)

| Pollutant                                   | lb/hr  | tonnes/yr |
|---|--------|-----------|
| CO <sub>2</sub>                             | 116.98 | 464.80    |
| CH <sub>4</sub>                             | <0.01  | 0.01      |
| N <sub>2</sub> O                            | <0.01  | <0.01     |
| CH <sub>4</sub> as CO <sub>2</sub> e        | 0.06   | 0.22      |
| N <sub>2</sub> O as CO <sub>2</sub> e       | 0.07   | 0.26      |
| Total CO <sub>2</sub> + CO <sub>2</sub> e = | 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 |

Notes:

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

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

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

#### SWN Production Company, LLC Thomas Parkinson Pad Stabilizer Heater Emissions Calculations - Criteria Air Pollutants

#### **Equipment Information**

| Unit ID:                  | <u>EU-SH1 - EU-SH2 (EACH)</u> |
|---------------------------|-------------------------------|
| Emission Point ID:        | EP-SH1 - EP-SH2               |
| Description:              | Stabilizer Heater             |
| Number of Units:          | 2                             |
| Burner Design (mmBtu/hr): | 1.5                           |
| Fuel HHV (Btu/scf):       | 905                           |
| Annual Fuel Use (mmscf):  | 14.52                         |
| Annual Operating Hours:   | 8,760                         |

### **Criteria Air Pollutant Emissions**

Unit ID:

EU-SH1 - EU-SH2 (EACH)

| Pollutant            | lb/hr | TPY   |
|----------------------|-------|-------|
| NOx                  | 0.17  | 0.73  |
| CO                   | 0.14  | 0.61  |
| VOC                  | 0.01  | 0.04  |
| SO <sub>2</sub>      | <0.01 | <0.01 |
| PM <sub>10/2.5</sub> | 0.01  | 0.04  |
| PM <sub>COND</sub>   | <0.01 | 0.01  |
| PM <sub>TOT</sub>    | 0.01  | 0.06  |

## 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              |

Notes:

<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 Thomas Parkinson Pad Stabilizer Heater Emissions Calculations - Hazardous Air Pollutants

### **Equipment Information**

| Unit ID:                  | <u>EU-SH1 - EU-SH2 (EACH)</u> |  |
|---------------------------|-------------------------------|--|
| Emission Point ID:        | EP-SH1 - EP-SH2               |  |
| Description:              | Stabilizer Heater             |  |
| Number of Units:          | 2                             |  |
| Burner Design (mmBtu/hr): | 1.5                           |  |
| Fuel HHV (Btu/scf):       | 905                           |  |
| Annual Fuel Use (mmscf):  | 14.52                         |  |
| Annual Operating Hours:   | 8,760                         |  |

#### Hazardous Air Pollutant Emissions

Unit ID:

EU-SH1 - EU-SH2 (EACH)

| Pollutant    | lb/hr | TPY   |
|--------------|-------|-------|
| n-Hexane     | <0.01 | 0.01  |
| Formaldehyde | <0.01 | <0.01 |
| Benzene      | <0.01 | <0.01 |
| Toluene      | <0.01 | <0.01 |
| Total HAP =  | <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 Thomas Parkinson Pad Stabilizer Heater Emissions Calculations - Greenhouse Gases

### **Equipment Information**

| Unit ID:                  | <u>EU-SH1 - EU-SH2 (EACH)</u> |
|---------------------------|-------------------------------|
| Emission Point ID:        | EP-SH1 - EP-SH2               |
| Description:              | Stabilizer Heater             |
| Number of Units:          | 2                             |
| Burner Design (mmBtu/hr): | 1.5                           |
| Fuel HHV (Btu/scf):       | 905                           |
| Annual Fuel Use (mmscf):  | 14.52                         |
| Annual Operating Hours:   | 8,760                         |

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

Unit ID:

EU-SH1 - EU-SH2 (EACH)

| Pollutant                                   | lb/hr  | tonnes/yr |
|---|--------|-----------|
| CO <sub>2</sub>                             | 175.47 | 697.21    |
| CH <sub>4</sub>                             | <0.01  | 0.01      |
| N <sub>2</sub> O                            | <0.01  | <0.01     |
| CH <sub>4</sub> as CO <sub>2</sub> e        | 0.08   | 0.33      |
| N <sub>2</sub> O as CO <sub>2</sub> e       | 0.10   | 0.39      |
| Total CO <sub>2</sub> + CO <sub>2</sub> e = | 175.65 | 697.93    |

# 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 |

Notes:

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

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

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

#### SWN Production Company, LLC Thomas Parkinson Pad Storage Tank Emissions - Criteria Air Pollutants

#### Tank Information

| Unit ID:                       | EU-TANKS-COND   | EU-TANKS-PW     |
|--------------------------------|-----------------|-----------------|
| Emission Point ID:             | APC-COMB        | APC-COMB        |
| Contents: <sup>1,3</sup>       | Condensate      | Produced Water  |
| Number of Tanks:               | 6               | 6               |
| Capacity (bbl) - Per Tank:     | 400             | 400             |
| Capacity (gal) - Per Tank:     | 16,800          | 16,800          |
| Total:                         |                 |                 |
| Total Throughput (bbl/yr):     | 492,203         | 660,103         |
| Total Throughput (gal/yr):     | 20,672,505      | 27,724,305      |
| Total Throughput (bbl/d):      | 1,349           | 1,809           |
| Per Tank:                      |                 |                 |
| Throughput (bbl/yr):           | 82,034          | 110,017         |
| Throughput (gal/yr):           | 3,445,418       | 4,620,718       |
| Throughput (bbl/d):            | 1,809           | 1,809           |
| Turnovers:                     | 1,230.51        | 1,650.26        |
| Tank Vapor Capture Efficiency: | 100%            | 100%            |
| Captured Vapors Routed to:     | Vapor Combustor | Vapor Combustor |

#### Uncontrolled Storage Tank Emissions<sup>2</sup>

| Unit ID:                     | EU-TANKS-COND |          | EU-TAM | <u>IKS-PW</u> |
|------------------------------|---------------|----------|--------|---------------|
| Emissions                    | lb/hr         | TPY      | lb/hr  | TPY           |
| Working and Breathing Losses | 26.19         | 114.73   | 0.07   | 0.30          |
| Flashing Losses              | 305.60        | 1,338.53 | 2.55   | 11.16         |
| Total VOC =                  | 331.79        | 1,453.26 | 2.62   | 11.46         |

**Controlled Storage Tank Emissions<sup>3</sup>** 

| EU-TANKS-COND |                               | EU-TANKS-PW   |   |  |
|---------------|-------------------------------|---|---|--|
| lb/hr         | ТРҮ                           | lb/hr   | TPY   |  |
| 0.52          | 2.29                          | <0.01   | 0.01  |  |
| 6.11          | 26.77                         | 0.05  | 0.22  |  |
| 6.64          | 29.07                         | 0.05  | 0.23  |  |
| 1.11          | 4.84                          | 0.01  | 0.04  |  |
|               | lb/hr<br>0.52<br>6.11<br>6.64 | Ib/hr         TPY           0.52         2.29           6.11         26.77           6.64         29.07 | Ib/hr         TPY         Ib/hr           0.52         2.29         <0.01 |  |

Notes:

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

<sup>2</sup> Tank working, breathing, and flashing emissions were calculated using Promax process simulation. Reports located in Attachment L. Uncontrolled tank working/breathing/flashing emissions will be routed to a vapor combustor with 100% capture efficiency.

<sup>3</sup> Controlled tank emissions are shown for reference only.

#### SWN Production Company, LLC Thomas Parkinson Pad Storage Tank Emissions - Hazardous Air Pollutants

#### **Uncontrolled Storage Tank Emissions**

| onitib.                    |        |          |       |       |
|----------------------------|--------|----------|-------|-------|
| Pollutant                  | lb/hr  | TPY      | lb/hr | TPY   |
| Total VOC = <sup>1,2</sup> | 331.79 | 1,453.26 | 2.62  | 11.46 |
| n-Hexane                   | 17.13  | 75.04    | 0.14  | 0.59  |
| Benzene                    | 0.22   | 0.95     | <0.01 | 0.01  |
| Toluene                    | 1.03   | 4.53     | 0.01  | 0.04  |
| Ethylbenzene               | 1.24   | 5.45     | 0.01  | 0.04  |
| Xylenes                    | 1.81   | 7.92     | 0.01  | 0.06  |
| Total HAP =                | 21.44  | 93.89    | 0.17  | 0.74  |

EU-TANKS-COND

## **Controlled Storage Tank Emissions**<sup>3</sup>

Unit ID:

Unit ID.

EU-TANKS-COND

**EU-TANKS-PW** 

EU-TANKS-PW

| Pollutant                | lb/hr | TPY   | lb/hr | TPY   |
|--------------------------|-------|-------|-------|-------|
| Total VOC = <sup>1</sup> | 6.64  | 29.07 | 0.05  | 0.23  |
| n-Hexane                 | 0.34  | 1.50  | <0.01 | 0.01  |
| Benzene                  | <0.01 | 0.02  | <0.01 | <0.01 |
| Toluene                  | 0.02  | 0.09  | <0.01 | <0.01 |
| Ethylbenzene             | 0.02  | 0.11  | <0.01 | <0.01 |
| Xylenes                  | 0.04  | 0.16  | <0.01 | <0.01 |
| Total HAP =              | 0.43  | 1.88  | <0.01 | 0.01  |

### Estimated HAP Composition (% by Weight)<sup>4</sup>

| Pollutant    | Wt%    |
|--------------|--------|
| n-Hexane     | 5.163% |
| Benzene      | 0.065% |
| Toluene      | 0.312% |
| Ethylbenzene | 0.375% |
| Xylenes      | 0.545% |
| Total HAP =  | 6.460% |

Notes:

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

<sup>2</sup> Uncontrolled condensate tank working/breathing/flashing emissions are controlled by a vapor combustor with 100% capture efficiency.

<sup>3</sup>Controlled tank emissions are shown for reference only.

<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.

### SWN Production Company, LLC Thomas Parkinson Pad Tank Emissions Calculations - Greenhouse Gases

### **Equipment Information**

| Unit ID:                       | EU-TANKS-COND   | EU-TANKS-PW     |
|--------------------------------|-----------------|-----------------|
| Emission Point ID:             | APC-COMB        | APC-COMB        |
| Contents: 1,3                  | Condensate      | Produced Water  |
| Number of Tanks:               | 6               | 6               |
| Capacity (bbl) - Per Tank:     | 400             | 400             |
| Capacity (gal) - Per Tank:     | 16,800          | 16,800          |
| Total:                         |                 |                 |
| Total Throughput (bbl/yr):     | 492,203         | 660,103         |
| Total Throughput (gal/yr):     | 20,672,505      | 27,724,305      |
| Total Throughput (bbl/d):      | 1,349           | 1,809           |
| Per Tank:                      |                 |                 |
| Throughput (bbl/yr):           | 82,034          | 110,017         |
| Throughput (gal/yr):           | 3,445,418       | 4,620,718       |
| Throughput (bbl/d):            | 1809            | 1809            |
| Turnovers:                     | 1230.51         | 1650.26         |
| Tank Vapor Capture Efficiency: | 100%            | 100%            |
| Captured Vapors Routed to:     | Vapor Combustor | Vapor Combustor |

# Uncontrolled Greenhouse Gas Emissions<sup>1,2</sup>

Unit ID:

EU-TANKS-COND

EU-TANKS-PW

| Greenhouse Gas                       | Avg. lb/hr <sup>3</sup> | tonnes/yr | Avg. lb/hr <sup>3</sup> | tonnes/yr |
|--------------------------------------|-------------------------|-----------|-------------------------|-----------|
| CH <sub>4</sub>                      | 1.86                    | 7.39      | 3.61                    | 14.33     |
| CH <sub>4</sub> as CO <sub>2</sub> e | 46.53                   | 184.87    | 90.14                   | 358.16    |
| CO <sub>2</sub>                      | 0.09                    | 0.36      | 0.15                    | 0.60      |
| Total $CO_2 + CO_2e =$               | 46.62                   | 185.23    | 90.29                   | 358.76    |
| Per Tank =                           | 7.77                    | 30.87     | 15.05                   | 59.79     |

| Greenhouse Gas                       | Avg. lb/hr <sup>3</sup> | tons/yr | Avg. lb/hr <sup>3</sup> | tons/yr |
|--------------------------------------|-------------------------|---------|-------------------------|---------|
| CH <sub>4</sub>                      | 1.86                    | 8.15    | 3.61                    | 15.79   |
| CH <sub>4</sub> as CO <sub>2</sub> e | 46.53                   | 203.78  | 90.14                   | 394.81  |
| CO <sub>2</sub>                      | 0.09                    | 0.40    | 0.15                    | 0.66    |
| Total $CO_2 + CO_2e =$               | 46.62                   | 204.18  | 90.29                   | 395.47  |
| Per Tank =                           | 7.77                    | 34.03   | 15.05                   | 65.91   |

#### SWN Production Company, LLC Thomas Parkinson Pad Tank Emissions Calculations - Greenhouse Gases

Notes:

1) Per API Chapter 5:  $CH_4$  and  $CO_2$  emissions from crude storage tanks occur mainly as a result of flashing; working and breathing loss emissions of these gases are very small in production and virtually non-existent in downstream segments. Unless site-specific data indicate otherwise, working and breathing losses are presumed to contain no  $CH_4$  or  $CO_2$ .

2)  $CO_2e = CO_2$  equivalent (Pollutant times GWP multiplier)

3) Due to variable short-term emission rates, average lb/hr based on annual emissions shown for reference only.

### 40 CFR 98 Table A-1, Global Warning Potential (GWP) Multiplier

|  | Methane (CH <sub>4</sub> ) | 25 |
|--|----------------------------|----|
|--|----------------------------|----|

#### SWN Production Company, LLC Thomas Parkinson Pad Condensate Truck Loading Emissions - Criteria and Hazardous Air Pollutants

#### Loading Information

| Unit ID:                               | EU-LOAD-COND            |
|--|-------------------------|
| Emission Point ID:                     | APC-COMB                |
| Fill Method:                           | Submerged               |
| Type of Service:                       | Dedicated               |
| Mode of Operation:                     | Normal                  |
| Saturation Factor:                     | 0.6                     |
| Em. Factor (lb/1000 gal): <sup>1</sup> | 9.47                    |
| Throughput (1000 gal):                 | 20,672.51               |
| Control Type:                          | Vapor Return/Combustion |
| Vapor Capture Efficiency: 1            | 70%                     |
| Average Fill Rate (gal/hr):            | 7,500                   |
| Captured Vapors Routed to:             | Vapor Combustor         |
| VOC Weight %:                          | 90.93%                  |

| 13.6190 | = P, True vapor pressure of liquid loaded (max. psia)  |
|---------|--|
| 51.51   | = M, Molecular weight of vapor (lb/lb-mol)             |
| 93.83   | = T, Temperature of bulk liquid loaded (average °F)    |
| 553.83  | = T, Temperature of bulk liquid loaded (°F + 460 = °R) |

# Uncontrolled Loading Emissions<sup>2</sup>

| Pollutant    | Max. Ib/hr | Avg. lb/hr | TPY   |
|--------------|------------|------------|-------|
| VOC =        | 64.58      | 20.51      | 89.83 |
| n-Hexane     | 3.33       | 1.06       | 4.64  |
| Benzene      | 0.04       | 0.01       | 0.06  |
| Toluene      | 0.20       | 0.06       | 0.28  |
| Ethylbenzene | 0.24       | 0.08       | 0.34  |
| Xylenes      | 0.35       | 0.11       | 0.49  |
| Total HAP =  | 4.17       | 1.32       | 5.80  |

# **Uncaptured Loading Emissions**<sup>2</sup>

| Pollutant    | Max. lb/hr | Avg. lb/hr | TPY   |
|--------------|------------|------------|-------|
| VOC =        | 19.37      | 6.15       | 26.95 |
| n-Hexane     | 1.00       | 0.32       | 1.39  |
| Benzene      | 0.01       | <0.01      | 0.02  |
| Toluene      | 0.06       | 0.02       | 0.08  |
| Ethylbenzene | 0.07       | 0.02       | 0.10  |
| Xylenes      | 0.11       | 0.03       | 0.15  |
| Total HAP =  | 1.25       | 0.40       | 1.74  |

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

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

| Pollutant    | Wt%    |
|--------------|--------|
| n-Hexane     | 5.163% |
| Benzene      | 0.065% |
| Toluene      | 0.312% |
| Ethylbenzene | 0.375% |
| Xylenes      | 0.545% |
| Total HAP =  | 6.460% |

Notes:

1 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>2</sup> Maximum lb/hr based on average hourly truck loading rate. Average lb/hr based on TPY conversion assuming continuous operation.

<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 Thomas Parkinson Pad Condensate Truck Loading Emissions - Greenhouse Gases

#### Loading Information

| Unit ID:   | EU-LOAD-COND            |
|--|-------------------------|
| 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):                        | 20.673                  |
| 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         |
| Analysis CH, wt% =                                       | 51 22273%               |

| Analysis CH <sub>4</sub> wt% = | 51.22273% |
|--------------------------------|-----------|
| Analysis CO <sub>2</sub> wt% = | 0.26415%  |

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

| Pollutant                                   | Max. Ib/hr | Avg. lb/hr | tonnes/yr | tons/yr |
|---|------------|------------|-----------|---------|
| CH <sub>4</sub>                             | 7.71       | 2.43       | 9.64      | 10.62   |
| CH <sub>4</sub> as CO <sub>2</sub> e        | 192.68     | 60.63      | 240.90    | 265.55  |
| CO <sub>2</sub>                             | 0.04       | 0.01       | 0.05      | 0.05    |
| Total CO <sub>2</sub> + CO <sub>2</sub> e = | 192.72     | 60.64      | 240.95    | 265.60  |

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

| Pollutant                                   | Max. lb/hr | Avg. Ib/hr | tonnes/yr | tons/yr |
|---|------------|------------|-----------|---------|
| CH <sub>4</sub>                             | 2.31       | 0.73       | 2.89      | 3.19    |
| CH <sub>4</sub> as CO <sub>2</sub> e        | 57.80      | 18.19      | 72.27     | 79.66   |
| CO <sub>2</sub>                             | 0.01       | <0.01      | 0.01      | 0.02    |
| Total CO <sub>2</sub> + CO <sub>2</sub> e = | 57.82      | 18.19      | 72.28     | 79.68   |

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

#### API Compendium Table 5-12

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

Notes:

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

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

 $^{4}$ CO<sub>2</sub>e = CO<sub>2</sub> equivalent (Pollutant times GWP multiplier):

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

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

#### Loading Information

| Unit ID:                    | EU-LOAD-PW |
|-----------------------------|------------|
| Emission Point ID:          | EP-LOAD-PW |
| Fill Method:                | Submerged  |
| Type of Service:            | Dedicated  |
| Mode of Operation:          | Normal     |
| Saturation Factor:          | 0.6        |
| Em. Factor (lb/1000 gal):   | 4.17       |
| Throughput (1000 gal):      | 27,724.31  |
| Control Type:               | None       |
| Average Fill Rate (gal/hr): | 7,500      |
| VOC Weight %:               | 9.54%      |
|                             |            |

| 13.4905 = | = P, True vapor pressure of liquid loaded (max. psia)  |
|-----------|--|
| 21.90 =   | = M, Molecular weight of vapor (lb/lb-mol)             |
| 70.00 =   | = T, Temperature of bulk liquid loaded (average °F)    |
| 530.00 =  | = T, Temperature of bulk liquid loaded (°F + 460 = °R) |

Uncontrolled Loading Emissions<sup>1</sup>

| Pollutant    | Max. Ib/hr | Avg. lb/hr | ТРҮ   |
|--------------|------------|------------|-------|
| VOC =        | 2.98       | 0.10       | 0.42  |
| n-Hexane     | 0.15       | <0.01      | 0.02  |
| Benzene      | <0.01      | <0.01      | <0.01 |
| Toluene      | 0.01       | <0.01      | <0.01 |
| Ethylbenzene | 0.01       | <0.01      | <0.01 |
| Xylenes      | 0.02       | <0.01      | <0.01 |
| Total HAP =  | 0.19       | 0.01       | 0.03  |

### Estimated HAP Composition (% by Weight)<sup>2</sup>

| Pollutant    | Wt%    |
|--------------|--------|
| n-Hexane     | 5.163% |
| Benzene      | 0.065% |
| Toluene      | 0.312% |
| Ethylbenzene | 0.375% |
| Xylenes      | 0.545% |
| Total HAP =  | 6.460% |

#### Notes:

<sup>1</sup> Maximum lb/hr based on average hourly truck loading rate. Average lb/hr based on TPY conversion assuming continuous operation.

<sup>2</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 Thomas Parkinson Pad Produced Water Truck Loading Emissions - Greenhouse Gases

### Loading Information

| Unit ID:   | EU-LOAD-PW |
|--|------------|
| 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):                        | 27.7243    |
| Control Type:  | None       |
| Average Fill Rate (gal/hr):                              | 7,500      |
|  |            |
| Analysis CH <sub>4</sub> wt% =                           | 51.22273%  |
| Analysis $CO_2$ wt% =                                    | 0.26415%   |

# Uncontrolled Loading Emissions<sup>2, 3</sup>

| Pollutant                                   | Max. Ib/hr | Avg. lb/hr | tonnes/yr | tons/yr |
|---|------------|------------|-----------|---------|
| CH <sub>4</sub>                             | 7.71       | 3.25       | 12.92     | 14.25   |
| $CH_4$ as $CO_2e$                           | 192.68     | 81.31      | 323.08    | 356.13  |
| CO <sub>2</sub>                             | 0.04       | 0.02       | 0.07      | 0.07    |
| Total CO <sub>2</sub> + CO <sub>2</sub> e = | 192.72     | 81.32      | 323.14    | 356.20  |

# API Compendium Table 5-12

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

Notes:

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

<sup>2</sup> Maximum lb/hr based on average hourly truck loading rate. Average lb/hr based on TPY conversion assuming continuous operation.

 ${}^{3}$ CO<sub>2</sub>e = CO<sub>2</sub> equivalent (Pollutant times GWP multiplier):

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

### SWN Production Company, LLC Thomas Parkinson Pad Vapor Combustor Emissions Calculations - Criteria and Hazardous Air Pollutants

### Criteria and Hazardous Air Pollutant Emissions

|          |              | Emission             | Total Capture | ed Emissions <sup>2</sup> | Combustor<br>Destruction<br>Efficiency |       | Emissions (Post-<br>Combustion) |
|----------|--------------|----------------------|---------------|---------------------------|--|-------|---------------------------------|
| Unit ID  | Pollutant    | Factors <sup>1</sup> | lb/hr         | TPY                       | %                                      | lb/hr | TPY                             |
|          | NOx          | 0.138                | -             | -                         | -                                      | 3.31  | 14.51                           |
| APC-COMB | со           | 0.2755               | -             |                           | -                                      | 6.61  | 28.96                           |
|          | РМ           | 7.6                  | -             |                           | -                                      | 0.07  | 0.30                            |
|          | VOC          | Mass Balance         | 348.77        | 1,527.60                  | 98.00%                                 | 6.98  | 30.55                           |
|          | n-Hexane     | Mass Balance         | 18.01         | 78.88                     | 98.00%                                 | 0.36  | 1.58                            |
|          | Benzene      | Mass Balance         | 0.23          | 1.00                      | 98.00%                                 | <0.01 | 0.02                            |
|          | Toluene      | Mass Balance         | 1.09          | 4.76                      | 98.00%                                 | 0.02  | 0.10                            |
|          | Ethylbenzene | Mass Balance         | 1.31          | 5.73                      | 98.00%                                 | 0.03  | 0.11                            |
|          | Xylenes      | Mass Balance         | 1.90          | 8.32                      | 98.00%                                 | 0.04  | 0.17                            |

Notes:

<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.

Hours per Year: Number of Combustors: Max. Incinerator Capacity: 8,760 1 211.70 lb/hr 24.0 mmBtu/hr per Combustor

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 each combustor =

24.0 mmBtu/hr Total Heat Input

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

## SWN Production Company, LLC Thomas Parkinson Pad Vapor Combustor Emissions Calculations - Criteria and Hazardous Air Pollutants (Continued)

|                              | Captured VOC Emissions |          |  |
|------------------------------|------------------------|----------|--|
| Source                       | lb/hr                  | TPY      |  |
| Condensate Storage Tanks     | 331.79                 | 1,453.26 |  |
| Produced Water Storage Tanks | 2.62                   | 11.46    |  |
| Condensate Truck Loading     | 14.36                  | 62.88    |  |
| Total VOC =                  | 348.77                 | 1,527.60 |  |

|                              | Captured HAP Emissions (lb/hr) |         |         |              |         |
|------------------------------|--------------------------------|---------|---------|--------------|---------|
| Source                       | n-Hexane                       | Benzene | Toluene | Ethylbenzene | Xylenes |
| Condensate Storage Tanks     | 17.13                          | 0.22    | 1.03    | 1.24         | 1.81    |
| Produced Water Storage Tanks | 0.14                           | <0.01   | 0.01    | 0.01         | 0.01    |
| Condensate Truck Loading     | 0.74                           | 0.01    | 0.04    | 0.05         | 0.08    |
| Total HAP =                  | 18.01                          | 0.23    | 1.09    | 1.31         | 1.90    |

|                              | Captured HAP Emissions (TPY) |         |         |              |         |
|------------------------------|------------------------------|---------|---------|--------------|---------|
| Source                       | n-Hexane                     | Benzene | Toluene | Ethylbenzene | Xylenes |
| Condensate Storage Tanks     | 75.04                        | 0.95    | 4.53    | 5.45         | 7.92    |
| Produced Water Storage Tanks | 0.59                         | 0.01    | 0.04    | 0.04         | 0.06    |
| Condensate Truck Loading     | 3.25                         | 0.04    | 0.20    | 0.24         | 0.34    |
| Total HAP =                  | 78.88                        | 1.00    | 4.76    | 5.73         | 8.32    |

### SWN Production Company, LLC Thomas Parkinson Pad Vapor Combustor Emissions Calculations - Greenhouse Gases

## Equipment Information

| Unit ID:                           | APC-COMB        |
|------------------------------------|-----------------|
| Description:                       | Vapor Combustor |
| Number of Combustors:              | 1               |
| Burner Design Capacity (mmBtu/hr): | 24.0            |
| Stream HHV (Btu/scf):              | 2,682           |
| Annual Throughput (mmscf):         | 78.39           |
| Annual Operating Hours:            | 8,760           |

# Greenhouse Gas (GHG) Emissions

| Pollutant                                   | lb/hr    | tonnes/yr | tons/yr   |
|---|----------|-----------|-----------|
| CO <sub>2</sub>                             | 2,807.45 | 11,155.31 | 12,296.63 |
| CH <sub>4</sub>                             | 0.05     | 0.21      | 0.23      |
| N <sub>2</sub> O                            | 0.01     | 0.02      | 0.02      |
| CH <sub>4</sub> as CO <sub>2</sub> e        | 1.32     | 5.26      | 5.79      |
| N <sub>2</sub> O as CO <sub>2</sub> e       | 1.58     | 6.27      | 6.91      |
| Total CO <sub>2</sub> + CO <sub>2</sub> e = | 2,810.35 | 11,166.83 | 12,309.33 |

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:

<sup>1</sup>  $CO_2e = CO_2$  equivalent (Pollutant times GWP multiplier):

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

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

# Criteria Air Pollutant Emissions

|           |                 | Emission<br>Factors <sup>1</sup> | Emissio | ns    |
|-----------|-----------------|----------------------------------|---------|-------|
| Unit ID   | Pollutant       | (lb/mmscf)                       | lb/hr   | ТРҮ   |
| EU-PILOTS | NOx             | 100                              | 0.02    | 0.09  |
| APC-COMB  | СО              | 84                               | 0.02    | 0.07  |
|           | 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                                |
| 200     | Total Pilot Gas Flow Rate (SCFH) <sup>2</sup> |
| 181,000 | Total Pilot Gas Fuel Use (Btu/hr)             |
| 1.75    | Total Annual Fuel Use (MMSCF)                 |

Notes:

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

<sup>2</sup> Vapor Combustor is equipped with four(4) pilots with a pilot fuel consumption of 50 SCFH per pilot.

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

# Hazardous Air Pollutant Emissions

|           |              | Emission             |           |       |
|-----------|--------------|----------------------|-----------|-------|
|           |              | Factors <sup>1</sup> | Emissions |       |
| Unit ID   | Pollutant    | (lb/mmscf)           | lb/hr     | ТРҮ   |
| EU-PILOTS | 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 HAP =          | <0.01     | <0.01 |

| 905     | Pilot Stream Heat Content (Btu/SCF)           |
|---------|---|
| 8,760   | Pilot Hours/Yr                                |
| 200     | Total Pilot Gas Flow Rate (SCFH) <sup>2</sup> |
| 181,000 | Total Pilot Gas Fuel Use (Btu/hr)             |
| 1.75    | Total Annual Fuel Use (MMSCF)                 |

Notes:

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

<sup>2</sup> Vapor Combustor is equipped with four (4) pilots with a pilot fuel consumption of 50 SCFH per pilot.

# SWN Production Company, LLC Thomas Parkinson Pad Vapor Combustor Pilot Emissions Calculations - Greenhouse Gases

# Greenhouse Gas (GHG) Emissions

|           |   | Emissions |           |         |  |  |
|-----------|---|-----------|-----------|---------|--|--|
| Unit ID   | Pollutant                                   | lb/hr     | tonnes/yr | tons/yr |  |  |
| EU-PILOTS | CO <sub>2</sub>                             | 21.17     | 84.13     | 92.74   |  |  |
| APC-COMB  | CH <sub>4</sub>                             | <0.01     | <0.01     | <0.01   |  |  |
|           | N <sub>2</sub> O                            | <0.01     | <0.01     | <0.01   |  |  |
|           | CH <sub>4</sub> as CO <sub>2</sub> e        | 0.01      | 0.04      | 0.04    |  |  |
|           | $N_2O$ as $CO_2e$                           | 0.01      | 0.05      | 0.05    |  |  |
|           | Total CO <sub>2</sub> + CO <sub>2</sub> e = | 21.19     | 84.22     | 92.83   |  |  |

| 905     | Pilot Stream Heat Content (Btu/SCF)           |
|---------|---|
| 8,760   | Pilot Hours/Yr                                |
| 200     | Total Pilot Gas Flow Rate (SCFH) <sup>2</sup> |
| 181,000 | Total Pilot Gas Fuel Use (Btu/hr)             |
| 1.75    | 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:

 $^{1}$ CO<sub>2</sub>e = CO<sub>2</sub> equivalent (Pollutant times GWP multiplier):

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

<sup>2</sup> Vapor Combustor is equipped with four (4) pilots with a pilot fuel consumption of 50 SCFH per pilot.

#### SWN Production Company, LLC Thomas Parkinson Pad Fugitive Emissions Calculations - Criteria and Hazardous Air Pollutants and Greenhouse Gases

# Equipment Information

| Source Type/Service                       | Number of<br>Sources <sup>1</sup> | Em. Factor<br>(lb/hr/source) <sup>2</sup> | Control<br>Efficiency | TOC lb/hr | ТОС ТРҮ | VOC Wt % |  |  |  |
|---|-----------------------------------|---|-----------------------|-----------|---------|----------|--|--|--|
| Valves - Gas                              | 109                               | 9.92E-03                                  | 0.00%                 | 1.08      | 4.74    | 23.15%   |  |  |  |
| Flanges - Gas                             | 514                               | 8.60E-04                                  | 0.00%                 | 0.44      | 1.94    | 23.15%   |  |  |  |
| Compressor Seals - Gas                    | 18                                | 1.94E-02                                  | 0.00%                 | 0.35      | 1.53    | 23.15%   |  |  |  |
| Relief Valves - Gas                       | 65                                | 1.94E-02                                  | 0.00%                 | 1.26      | 5.52    | 23.15%   |  |  |  |
|   |                                   | Total TOC (Gas                            | Components) =         | 3.13      | 13.72   | -        |  |  |  |
| Valves - Light Oil                        | 200                               | 5.51E-03                                  | 0.00%                 | 1.10      | 4.83    | 95.45%   |  |  |  |
| Flanges - Light Oil                       | 48                                | 2.43E-04                                  | 0.00%                 | 0.01      | 0.05    | 95.45%   |  |  |  |
| Connectors - Light Oil                    | 698                               | 4.63E-04                                  | 0.00%                 | 0.32      | 1.42    | 95.45%   |  |  |  |
| Other - Light Oil                         | 8                                 | 1.65E-02                                  | 0.00%                 | 0.13      | 0.58    | 95.45%   |  |  |  |
| Total TOC (Liquid Components) = 1.57 6.87 |                                   |   |                       |           |         |          |  |  |  |

## VOC and Greenhouse Gas Emissions

| Source Type/Service               | VOC   |      | C     | H <sub>4</sub> | CO <sub>2</sub> |       |
|-----------------------------------|-------|------|-------|----------------|-----------------|-------|
| Source Type/Service               | lb/hr | TPY  | lb/hr | TPY            | lb/hr           | TPY   |
| Valves - Gas                      | 0.25  | 1.10 | 0.56  | 2.45           | <0.01           | 0.01  |
| Flanges - Gas                     | 0.10  | 0.45 | 0.23  | 1.00           | <0.01           | 0.01  |
| Compressor Seals - Gas            | 0.08  | 0.35 | 0.18  | 0.79           | <0.01           | <0.01 |
| Relief Valves - Gas               | 0.29  | 1.28 | 0.65  | 2.85           | <0.01           | 0.01  |
| Components in Gas Service =       | 0.73  | 3.18 | 1.62  | 7.09           | 0.01            | 0.04  |
| Valves - Light Oil                | 1.05  | 4.61 | 0.01  | 0.05           | <0.01           | <0.01 |
| Flanges - Light Oil               | 0.01  | 0.05 | <0.01 | <0.01          | <0.01           | <0.01 |
| Connectors - Light Oil            | 0.31  | 1.35 | <0.01 | 0.01           | <0.01           | <0.01 |
| Other - Light Oil                 | 0.13  | 0.55 | <0.01 | 0.01           | <0.01           | <0.01 |
| Components in Liquid Service =    | 1.50  | 6.56 | 0.02  | 0.07           | <0.01           | <0.01 |
| Total (Gas + Liquid Components) = | 2.22  | 9.74 | 1.64  | 7.16           | 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   | 0.00         | <0.01   | 0.00       | <0.01 |
| Flanges - Gas                     | <0.01    | <0.01   | <0.01   | 0.00         | <0.01   | 0.00       | <0.01 |
| Compressor Seals - Gas            | <0.01    | <0.01   | <0.01   | 0.00         | <0.01   | 0.00       | <0.01 |
| Relief Valves - Gas               | <0.01    | <0.01   | <0.01   | 0.00         | <0.01   | 0.00       | <0.01 |
| Components in Gas Service =       | 0.01     | <0.01   | <0.01   | 0.00         | <0.01   | 0.00       | 0.01  |
| Valves - Light Oil                | 0.06     | <0.01   | <0.01   | <0.01        | 0.01    | 0.00       | 0.07  |
| Flanges - Light Oil               | <0.01    | <0.01   | <0.01   | <0.01        | <0.01   | 0.00       | <0.01 |
| Connectors - Light Oil            | 0.02     | <0.01   | <0.01   | <0.01        | <0.01   | 0.00       | 0.02  |
| Other - Light Oil                 | 0.01     | <0.01   | <0.01   | <0.01        | <0.01   | 0.00       | 0.01  |
| Components in Liquid Service =    | 0.08     | <0.01   | <0.01   | 0.01         | 0.01    | 0.00       | 0.10  |
| Total (Gas + Liquid Components) = | 0.09     | <0.01   | 0.01    | 0.01         | 0.01    | 0.00       | 0.11  |

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

| Source Type/Service               | n-Hexane | Benzene | Toluene | Ethylbenzene | Xylenes | 2,2,4-Tri. | Total |
|-----------------------------------|----------|---------|---------|--------------|---------|------------|-------|
| Valves - Gas                      | 0.01     | <0.01   | <0.01   | 0.00         | <0.01   | 0.00       | 0.01  |
| Flanges - Gas                     | 0.01     | <0.01   | <0.01   | 0.00         | <0.01   | 0.00       | 0.01  |
| Compressor Seals - Gas            | <0.01    | <0.01   | <0.01   | 0.00         | <0.01   | 0.00       | <0.01 |
| Relief Valves - Gas               | 0.01     | <0.01   | <0.01   | 0.00         | <0.01   | 0.00       | 0.02  |
| Components in Gas Service =       | 0.04     | <0.01   | <0.01   | 0.00         | <0.01   | 0.00       | 0.04  |
| Valves - Light Oil                | 0.25     | <0.01   | 0.02    | 0.02         | 0.03    | 0.00       | 0.31  |
| Flanges - Light Oil               | <0.01    | <0.01   | <0.01   | <0.01        | <0.01   | 0.00       | <0.01 |
| Connectors - Light Oil            | 0.07     | <0.01   | <0.01   | 0.01         | 0.01    | 0.00       | 0.09  |
| Other - Light Oil                 | 0.03     | <0.01   | <0.01   | <0.01        | <0.01   | 0.00       | 0.04  |
| Components in Liquid Service =    | 0.35     | <0.01   | 0.02    | 0.03         | 0.04    | 0.00       | 0.44  |
| Total (Gas + Liquid Components) = | 0.39     | <0.01   | 0.02    | 0.03         | 0.04    | 0.00       | 0.48  |

| Source Type/Service          | WH | GPU | HT | LPT | FGC | ТК | TT-O | SP |
|------------------------------|----|-----|----|-----|-----|----|------|----|
| Valves - Gas                 | 12 | 3   | 2  | 5   | 5   | 0  | 0    | 0  |
| Flanges - Gas                | 37 | 15  | 9  | 24  | 33  | 3  | 2    | 0  |
| Compressor Seals - Gas       | 0  | 0   | 0  | 0   | 3   | 0  | 0    | 0  |
| Relief Valves - Gas          | 1  | 3   | 1  | 1   | 1   | 3  | 1    | 0  |
| Open-Ended Lines - Gas       | 0  | 0   | 0  | 0   | 0   | 0  | 0    | 0  |
| Valves - Light Oil           | 0  | 5   | 6  | 12  | 3   | 6  | 9    | 8  |
| Flanges - Light Oil          | 0  | 0   | 0  | 0   | 0   | 0  | 0    | 6  |
| Connectors - Light Oil       | 0  | 20  | 24 | 48  | 12  | 24 | 30   | 20 |
| Pump Seals - Light Oil       | 0  | 0   | 0  | 0   | 0   | 0  | 0    | 0  |
| Other - Light Oil            | 0  | 0   | 0  | 0   | 0   | 0  | 0    | 1  |
| Equipment Type               | WH | GPU | HT | LPT | FGC | ТК | TT-0 | SP |
| Number of Each Type On Pad = | 5  | 5   | 2  | 0   | 6   | 12 | 1    | 8  |

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

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

| Component               | Molecular<br>Weight | Mole %     | Equiv. Wt.<br>Basis | Weight %    | HC Weight % | lb/hr | ТРҮ   |
|-------------------------|---------------------|------------|---------------------|-------------|-------------|-------|-------|
| Hydrogen Sulfide        | 34.082              | 0.000%     | 0.000               | 0.000%      | -           | 0.00  | 0.00  |
| Carbon Dioxide          | 44.010              | 0.133%     | 0.059               | 0.264%      | -           | 0.01  | 0.04  |
| Nitrogen                | 28.013              | 0.496%     | 0.139               | 0.627%      | -           | 0.02  | 0.09  |
| Methane                 | 16.042              | 70.754%    | 11.350              | 51.223%     | 51.683%     | 1.62  | 7.09  |
| Ethane                  | 30.069              | 18.380%    | 5.527               | 24.941%     | 25.165%     | 0.79  | 3.45  |
| Propane                 | 44.096              | 7.198%     | 3.174               | 14.324%     | 14.453%     | 0.45  | 1.98  |
| i-Butane                | 58.122              | 0.590%     | 0.343               | 1.548%      | 1.561%      | 0.05  | 0.21  |
| n-Butane                | 58.122              | 1.711%     | 0.994               | 4.488%      | 4.528%      | 0.14  | 0.62  |
| i-Pentane               | 72.149              | 0.214%     | 0.154               | 0.697%      | 0.703%      | 0.02  | 0.10  |
| n-Pentane               | 72.149              | 0.317%     | 0.229               | 1.032%      | 1.041%      | 0.03  | 0.14  |
| n-Hexane                | 86.175              | 0.067%     | 0.058               | 0.261%      | 0.263%      | 0.01  | 0.04  |
| Other Hexanes           | 86.175              | 0.080%     | 0.069               | 0.311%      | 0.314%      | 0.01  | 0.04  |
| Heptanes (as n-Heptane) | 100.202             | 0.041%     | 0.041               | 0.185%      | 0.187%      | 0.01  | 0.03  |
| Benzene                 | 78.114              | 0.001%     | 0.001               | 0.004%      | 0.004%      | <0.01 | <0.01 |
| Toluene                 | 92.141              | 0.001%     | 0.001               | 0.004%      | 0.004%      | <0.01 | <0.01 |
| Ethylbenzene            | 106.167             | 0.000%     | 0.000               | 0.000%      | 0.000%      | 0.00  | 0.00  |
| 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             | 0.011%     | 0.013               | 0.057%      | 0.057%      | <0.01 | 0.01  |
| Nonanes (as n-Nonane)   | 128.255             | 0.003%     | 0.004               | 0.017%      | 0.018%      | <0.01 | <0.01 |
| Decanes (as n-Decane)   | 142.282             | 0.002%     | 0.003               | 0.013%      | 0.013%      | <0.01 | <0.01 |
|                         | TOTAL =             | 100.00%    | 22.16               | 100.00%     | 100.00%     | 3.16  | 13.85 |
|                         | I                   | TOTAL HC = | 21.96               | TOTAL VOC = | 23.15%      | 0.73  | 3.18  |
|                         |                     | •          |                     | TOTAL HAP = | 0.28%       | 0.01  | 0.04  |

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

| Component               | Molecular<br>Weight | Mole %     | Equiv. Wt.<br>Basis | Weight %    | HC Weight % | lb/hr | ТРҮ   |
|-------------------------|---------------------|------------|---------------------|-------------|-------------|-------|-------|
| Hydrogen Sulfide        | 34.082              | 0.000%     | 0.000               | 0.000%      | -           | 0.00  | 0.00  |
| Carbon Dioxide          | 44.010              | 0.010%     | 0.004               | 0.005%      | -           | <0.01 | <0.01 |
| Nitrogen                | 28.013              | 0.015%     | 0.004               | 0.005%      | -           | <0.01 | <0.01 |
| Methane                 |                     | 5.084%     | 0.816               | 1.018%      | 1.018%      | 0.02  | 0.07  |
| Ethane                  | 30.069              | 9.419%     | 2.832               | 3.536%      | 3.536%      | 0.06  | 0.24  |
| Propane                 | 44.096              | 13.438%    | 5.926               | 7.398%      | 7.398%      | 0.12  | 0.51  |
| i-Butane                | 58.122              | 2.701%     | 1.570               | 1.960%      | 1.960%      | 0.03  | 0.13  |
| n-Butane                |                     | 11.641%    | 6.766               | 8.447%      | 8.448%      | 0.13  | 0.58  |
| i-Pentane               | 72.149              | 3.950%     | 2.850               | 3.558%      | 3.558%      | 0.06  | 0.24  |
| n-Pentane               | 72.149              | 7.673%     | 5.536               | 6.911%      | 6.912%      | 0.11  | 0.48  |
| n-Hexane                | 86.175              | 4.799%     | 4.136               | 5.163%      | 5.163%      | 0.08  | 0.35  |
| Other Hexanes           | 86.175              | 4.886%     | 4.211               | 5.256%      | 5.257%      | 0.08  | 0.36  |
| Heptanes (as n-Heptane) | 100.202             | 8.310%     | 8.327               | 10.395%     | 10.396%     | 0.16  | 0.71  |
| Benzene                 | 78.114              | 0.067%     | 0.052               | 0.065%      | 0.065%      | <0.01 | <0.01 |
| Toluene                 | 92.141              | 0.271%     | 0.250               | 0.312%      | 0.312%      | <0.01 | 0.02  |
| Ethylbenzene            | 106.167             | 0.283%     | 0.300               | 0.375%      | 0.375%      | 0.01  | 0.03  |
| Xylenes                 | 106.167             | 0.411%     | 0.436               | 0.545%      | 0.545%      | 0.01  | 0.04  |
| 2,2,4-Trimethylpentane  | 114.230             | 0.000%     | 0.000               | 0.000%      | 0.000%      | 0.00  | 0.00  |
| Octanes (as n-Octane)   | 114.229             | 6.334%     | 7.235               | 9.033%      | 9.034%      | 0.14  | 0.62  |
| Nonanes (as n-Nonane)   | 128.255             | 4.366%     | 5.600               | 6.991%      | 6.991%      | 0.11  | 0.48  |
| Decanes (as n-Decane)   | 142.282             | 16.342%    | 23.252              | 29.028%     | 29.031%     | 0.46  | 2.00  |
|                         | TOTAL =             | 100.00%    | 80.10               | 100.00%     | 100.00%     | 1.57  | 6.87  |
|                         |                     | TOTAL HC = | 80.09               | TOTAL VOC = | 95.45%      | 1.50  | 6.56  |
|                         |                     |            |                     | TOTAL HAP = | 6.46%       | 0.10  | 0.44  |

Notes:

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

<sup>3</sup> Equipment Type Key: WH = Well Head, GPU = Gas Production Unit, HT = Heater, LPT = Low-Pressure Tower, FGC = Flash Gas Compressor, TK = Storage Tank, TT-O = Tank Truck - Oil SP = Separator

<sup>4</sup> Gas and liquids analyses located in Attachment L.

#### SWN Production Company, LLC Thomas Parkinson Pad Fugitive Haul Road Emissions

#### Facility Data<sup>1</sup>

| Vehicle Type  | Light<br>Vehicles<br>(Pick-ups and<br>Cars) | Medium<br>Trucks<br>(Service<br>Trucks) | Heavy Trucks<br>(Tanker<br>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            | 8   | 4                                       | 17  |
| Distance per round trip (miles/trip)                      | 0.17  | 0.17                                    | 0.17  |
| Vehicle miles travelled (miles/day)                       | 1.41  | 0.71                                    | 2.82  |
| Number of days operational (days/yr)                      | 365   | 365                                     | 365   |
| Vehicle miles travelled VMT (miles/yr)                    | 515   | 258                                     | 1,031   |
| Average vehicle speed S (mph)                             | 10  | 10                                      | 10  |
| Average number of round trips/hour/vehicle type           | 0.46  | 0.23                                    | 0.92  |
| Average number of round trips/year/vehicle type           | 3,032                                       | 1,516                                   | 6,065   |
| Estimated maximum number of round trips/hour/vehicle type | 3   | 3                                       | 2   |
| Estimated maximum number of round trips/day/vehicle type  | 6   | 4                                       | 19  |
| Estimated maximum number of round trips/year/vehicle type | 2,300                                       | 1,533                                   | 7,135   |

190 Average Tanker Volume (bbl)
7,980 Gallons Tanker Volume
1,809 bwpd
1,349 bopd
16.62 Tanker Trucks per Day
149 Length Leased Access Road (ft)
300 Longest Pad Side (ft)
897 Total Round Trip Feet

#### Formula & Calculation Inputs

| E=k(s/12) <sup>a</sup> * (W/3) <sup>b</sup> * ((365-P) / 365)      | Reference : AP-42, S | ection 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/VM           | T AP-42 Section 13.2.2 (11/06), Table 13.2.2-2 (PM)                                  |                                  |
| k = PM10 Particle Size Multiplier                                  | 1.50 lb/VM           | T 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/VM           | T 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/y           | Pear AP-42 Section 13.2.2 (11/06), Figure 13.2.2-1                                   |                                  |
| a = PM Constant  | 0.70 unitles         | AP-42 Section 13.2.2 (11/06), Table 13.2.2-2 (PM)                                    |                                  |
| a = PM10 & PM2.5 Constant  | 0.90 unitles         | 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 unitles         | AP-42 Section 13.2.2 (11/06), Table 13.2.2-2   |                                  |
| Total hourly fleet vehicle miles travelled (miles/hr)              | 0.27 VMT/h           | ۱۲<br>۲  |                                  |
| Total annual fleet vehicle miles travelled (miles/yr) <sup>3</sup> | 1,803.38 VMT/y       | r  |                                  |
| Average wheels <sup>4</sup>  | 13                   |  |                                  |
| Average vehicle weight of the fleet (W) <sup>5</sup>               | 16.1 tons            |  |                                  |
| Moisture Ratio   | 1.00                 | Estimated based on 0.2% uncontrolled surface water content assuming no watering      | EPA - BID Document 13.2.2 - 1998 |
| Control Efficiency (CF)  | 0.00 %               | Based on Moisture Ratio and Figure 13.2.2-2 Control                                  |                                  |

#### SWN Production Company, LLC Thomas Parkinson Pad Fugitive Haul Road Emissions (Continued)

|                | Emission  | Factors          |                   | Control    | Total Veh | icle Miles |                                    | Emission Rates | ;                 | Emission Rates |                        |                   |  |
|----------------|-----------|------------------|-------------------|------------|-----------|------------|------------------------------------|----------------|-------------------|----------------|------------------------|-------------------|--|
|                | PM        | PM <sub>10</sub> | PM <sub>2.5</sub> | Efficiency | Travelled |            | Total PM Total PM <sub>10</sub> PM |                | PM <sub>2.5</sub> | Total PM       | Total PM <sub>10</sub> | PM <sub>2.5</sub> |  |
| Vehicle Type   | (Ibs/VMT) | (lbs/VMT)        | (Ibs/VMT)         | (%)        | (VMT/hr)  | (VMT/yr)   | (lb/hr)                            | (lb/hr)        | (lb/hr)           | (tons/yr)      | (tons/yr)              | (tons/yr)         |  |
| Light Vehicles | 2.80      | 0.69             | 0.07              | 0.00       | 0.08      | 515.25     | 0.22                               | 0.05           | 0.01              | 0.72           | 0.18                   | 0.02              |  |
| Medium Trucks  | 2.80      | 0.69             | 0.07              | 0.00       | 0.04      | 257.63     | 0.11                               | 0.03           | <0.01             | 0.36           | 0.09                   | 0.01              |  |
| Heavy Trucks   | 2.80      | 0.69             | 0.07              | 0.00       | 0.16      | 1,030.50   | 0.44                               | 0.11           | 0.01              | 1.44           | 0.35                   | 0.04              |  |
| Total =        |           |                  |                   |            | 0.27      | 1,803.38   | 0.77                               | 0.19           | 0.02              | 2.53           | 0.62                   | 0.06              |  |

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 vehicle type/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**

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

$$\begin{split} & \textit{E} = \textit{annual emissions (tons/yr)} \\ & \textit{EF}_{ext} = \textit{annual size-specific emission factor extrapolated for natural mitigation, lb/VMT} \\ & \textit{CF} = \textit{control efficiency (\%)} \end{split}$$

# ATTACHMENT U: FACILITY-WIDE EMISSION SUMMARY SHEETS

| Emission Point ID #  | N     | OX    | с с   | СО    |       | VOC   |        | D <sub>2</sub> | PN    | 1 <sub>10</sub> | PM <sub>2.5</sub> |      | CH4    |       | GHG (    | (CO <sub>2</sub> e) |
|----------------------|-------|-------|-------|-------|-------|-------|--------|----------------|-------|-----------------|-------------------|------|--------|-------|----------|---------------------|
| Emission I onit 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  | 0.16  | 0.69  | < 0.01 | < 0.01         | 0.02  | 0.11            | 0.02              | 0.11 | < 0.01 | 0.01  | 155.19   | 679.73              |
| EP-ENG2              | 0.32  | 1.40  | 0.64  | 2.80  | 0.16  | 0.69  | < 0.01 | < 0.01         | 0.02  | 0.11            | 0.02              | 0.11 | < 0.01 | 0.01  | 155.19   | 679.73              |
| EP-ENG3              | 0.32  | 1.40  | 0.64  | 2.80  | 0.16  | 0.69  | < 0.01 | < 0.01         | 0.02  | 0.11            | 0.02              | 0.11 | < 0.01 | 0.01  | 155.19   | 679.73              |
| EP-ENG4              | 0.45  | 1.96  | 0.90  | 3.92  | 0.23  | 1.00  | < 0.01 | < 0.01         | 0.04  | 0.16            | 0.04              | 0.16 | < 0.01 | 0.02  | 217.27   | 951.66              |
| EP-ENG5              | 0.45  | 1.96  | 0.90  | 3.92  | 0.23  | 1.00  | < 0.01 | < 0.01         | 0.04  | 0.16            | 0.04              | 0.16 | < 0.01 | 0.02  | 217.27   | 951.66              |
| EP-ENG6              | 0.20  | 0.89  | 0.41  | 1.78  | 0.10  | 0.43  | < 0.01 | < 0.01         | 0.02  | 0.07            | 0.02              | 0.07 | < 0.01 | 0.01  | 91.57    | 401.08              |
| EP-GPU1              | 0.11  | 0.48  | 0.09  | 0.41  | 0.01  | 0.03  | < 0.01 | < 0.01         | 0.01  | 0.04            | 0.01              | 0.04 | < 0.01 | 0.01  | 117.10   | 512.89              |
| EP-GPU2              | 0.11  | 0.48  | 0.09  | 0.41  | 0.01  | 0.03  | < 0.01 | < 0.01         | 0.01  | 0.04            | 0.01              | 0.04 | < 0.01 | 0.01  | 117.10   | 512.89              |
| EP-GPU3              | 0.11  | 0.48  | 0.09  | 0.41  | 0.01  | 0.03  | < 0.01 | < 0.01         | 0.01  | 0.04            | 0.01              | 0.04 | < 0.01 | 0.01  | 117.10   | 512.89              |
| EP-GPU4              | 0.11  | 0.48  | 0.09  | 0.41  | 0.01  | 0.03  | < 0.01 | < 0.01         | 0.01  | 0.04            | 0.01              | 0.04 | < 0.01 | 0.01  | 117.10   | 512.89              |
| EP-GPU5              | 0.11  | 0.48  | 0.09  | 0.41  | 0.01  | 0.03  | < 0.01 | < 0.01         | 0.01  | 0.04            | 0.01              | 0.04 | < 0.01 | 0.01  | 117.10   | 512.89              |
| EP-SH1               | 0.17  | 0.73  | 0.14  | 0.61  | 0.01  | 0.04  | < 0.01 | < 0.01         | 0.01  | 0.06            | 0.01              | 0.06 | < 0.01 | 0.01  | 175.65   | 769.33              |
| EP-SH2               | 0.17  | 0.73  | 0.14  | 0.61  | 0.01  | 0.04  | < 0.01 | < 0.01         | 0.01  | 0.06            | 0.01              | 0.06 | < 0.01 | 0.01  | 175.65   | 769.3               |
| EP-LOAD-COND         | -     | -     | -     | -     | 6.15  | 26.95 | -      | -              | -     | -               | -                 | -    | 0.73   | 3.19  | 18.19    | 79.68               |
| EP-LOAD-PW           | -     | -     | -     | -     | 0.10  | 0.42  | -      | -              | -     | -               | -                 | -    | 3.25   | 14.25 | 81.32    | 356.2               |
| APC-COMB             | 3.33  | 14.59 | 6.63  | 29.03 | 6.98  | 30.56 | < 0.01 | < 0.01         | 0.07  | 0.30            | 0.07              | 0.30 | 0.05   | 0.23  | 2,831.55 | 12,402.             |
|                      |       |       |       |       |       |       |        |                |       |                 |                   |      |        |       |          |                     |
| TOTAL                | 6.27  | 27.48 | 11.49 | 50.30 | 14.30 | 62.62 | 0.01   | 0.04           | 0.30  | 1.30            | 0.30              | 1.30 | 4.07   | 17.82 | 4,859.53 | 21,284.             |

### ATTACHMENT U – FACILITY-WIDE CONTROLLED EMISSIONS SUMMARY SHEET

List all sources of emissions in this table. Use extra pages if necessary.

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

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 storage tanks and condensate 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 #  | Formaldehyde |        | Benzene |        | Tolı   | Toluene |        | Ethylbenzene |        | Xylenes |        | Hexane |        | HAPs |
| Emission Fond ID #   | lb/hr        | tpy    | lb/hr   | tpy    | lb/hr  | tpy     | lb/hr  | tpy          | lb/hr  | tpy     | lb/hr  | tpy    | lb/hr  | tpy  |
| EP-ENG1  | 0.09         | 0.38   | < 0.01  | 0.01   | < 0.01 | < 0.01  | < 0.01 | < 0.01       | < 0.01 | < 0.01  | -      | -      | 0.10   | 0.44 |
| EP-ENG2  | 0.09         | 0.38   | < 0.01  | 0.01   | < 0.01 | < 0.01  | < 0.01 | < 0.01       | < 0.01 | < 0.01  | -      | -      | 0.10   | 0.44 |
| EP-ENG3  | 0.09         | 0.38   | < 0.01  | 0.01   | < 0.01 | < 0.01  | < 0.01 | < 0.01       | < 0.01 | < 0.01  | -      | -      | 0.10   | 0.44 |
| EP-ENG4  | 0.11         | 0.49   | < 0.01  | 0.01   | < 0.01 | < 0.01  | < 0.01 | < 0.01       | < 0.01 | < 0.01  | -      | -      | 0.13   | 0.58 |
| EP-ENG5  | 0.11         | 0.49   | < 0.01  | 0.01   | < 0.01 | < 0.01  | < 0.01 | < 0.01       | < 0.01 | < 0.01  | -      | -      | 0.13   | 0.58 |
| EP-ENG6  | 0.02         | 0.07   | < 0.01  | 0.01   | < 0.01 | < 0.01  | < 0.01 | < 0.01       | < 0.01 | < 0.01  | -      | -      | 0.02   | 0.11 |
| EP-GPU1  | < 0.01       | < 0.01 | < 0.01  | < 0.01 | < 0.01 | < 0.01  | -      | -            | -      | -       | < 0.01 | 0.01   | < 0.01 | 0.01 |
| EP-GPU2  | < 0.01       | < 0.01 | < 0.01  | < 0.01 | < 0.01 | < 0.01  | -      | -            | -      | -       | < 0.01 | 0.01   | < 0.01 | 0.01 |
| EP-GPU3  | < 0.01       | < 0.01 | < 0.01  | < 0.01 | < 0.01 | < 0.01  | -      | -            | -      | -       | < 0.01 | 0.01   | < 0.01 | 0.01 |
| EP-GPU4  | < 0.01       | < 0.01 | < 0.01  | < 0.01 | < 0.01 | < 0.01  | -      | -            | -      | -       | < 0.01 | 0.01   | < 0.01 | 0.01 |
| EP-GPU5  | < 0.01       | < 0.01 | < 0.01  | < 0.01 | < 0.01 | < 0.01  | -      | -            | -      | -       | < 0.01 | 0.01   | < 0.01 | 0.01 |
| EP-SH1   | < 0.01       | < 0.01 | < 0.01  | < 0.01 | < 0.01 | < 0.01  | -      | -            | -      | -       | < 0.01 | 0.01   | < 0.01 | 0.01 |
| EP-SH2   | < 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  | 0.02   | 0.02   | 0.08    | 0.02   | 0.10         | 0.03   | 0.15    | 0.32   | 1.39   | 0.40   | 1.74 |
| EP-LOAD-PW   | -            | -      | < 0.01  | < 0.01 | < 0.01 | < 0.01  | < 0.01 | < 0.01       | < 0.01 | < 0.01  | < 0.01 | 0.02   | 0.01   | 0.03 |
| APC-COMB   | < 0.01       | < 0.01 | < 0.01  | 0.02   | 0.02   | 0.10    | 0.03   | 0.11         | 0.04   | 0.17    | 0.36   | 1.58   | 0.45   | 1.98 |
|  |              |        |         |        |        |         |        |              |        |         |        |        |        |      |
|  |              |        |         |        |        |         |        |              |        |         |        |        |        |      |
| TOTAL  | 0.50         | 2.19   | 0.02    | 0.09   | 0.05   | 0.20    | 0.05   | 0.22         | 0.07   | 0.32    | 0.70   | 3.06   | 1.46   | 6.39 |

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

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 storage tanks and condensate loading operations, as well as combustor pilot emissions.

# ATTACHMENT V: 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 (Thomas Parkinson Pad) located on Bealls Ridge Rd. in Wellsburg, in Brooke County, West Virginia. From I-70 turn right on US Rt. 40 east and travel 4.4 miles to the Rt. 40 staging area. From Rt.40 staging turn left on US Rt.40 east and travel 3.3 miles to intersection of US 40 east and CR-45, (Atkinson Crossing), and turn left on CR-45. Travel 1.1 mile on CR-45 to intersection of CR-45 and CR-47, (Potomac Ridge Rd), and turn left on CR-45. Travel 0.8 miles on CR-45 to intersection of CR-45 and CR-37, (GC&P Rd), and stay straight through on CR-37. Travel 1.8 miles to intersection of CR-37 and CR-7/3, (Harvey Rd), and turn right on CR-55. Travel CR-7/3 for 0.3 miles to intersection of CR-55 and SR-88 and turn right on SR-88 North. Travel SR-88 North 3.1 miles to intersection of SR-88 and SR-67 and turn right on SR-67 east. Turn immediately left on SR-88 North and travel 0.7 miles to access road on right. Latitude and longitude coordinates are: 40.21907, -80.564713.

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

| Nitrogen Oxides (NOx)             | 27.48 tons/yr     |
|-----------------------------------|-------------------|
| Carbon Monoxide (CO)              | 50.30 tons/yr     |
| Volatile Organic Compounds (VOC)  | 62.62 tons/yr     |
| Sulfur Dioxide (SO <sub>2</sub> ) | 0.04 tons/yr      |
| Particulate Matter (PM)           | 1.30 tons/yr      |
| Acetaldehyde                      | 0.10 tons/yr      |
| Acrolein                          | 0.09 tons/yr      |
| Benzene                           | 0.10 tons/yr      |
| Ethylbenzene                      | 0.24 tons/yr      |
| Formaldehyde                      | 2.19 tons/yr      |
| Methanol                          | 0.11 tons/yr      |
| n-Hexane                          | 3.45 tons/yr      |
| Toluene                           | 0.22 tons/yr      |
| Xylenes                           | 0.36 tons/yr      |
| Carbon Dioxide                    | 20,827.60 tons/yr |
| Methane                           | 24.99 tons/yr     |
| Nitrous Oxide                     | 0.04 tons/yr      |
| CO <sub>2</sub> Equivalent        | 21,463.84 tons/yr |

Operations is planned to begin on or about May 1, 2018. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57<sup>th</sup> 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 XX<sup>th</sup> of January 2018

By: SWN Production Company, LLC Clay Murral Regulatory Supervisor 179 Innovation Drive Jane Lew, WV 26378