



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

FEB 14 2017

The Honorable Wainwright Velarde
President of the Jicarilla Apache Nation
P.O. Box 507
Dulce, New Mexico 87528

RE: Initial Title V Permit for Williams Four Corners, LLC – E & H Receiver

Dear President Velarde:

The Environmental Protection Agency (EPA) Region 6 is in the process of drafting a Part 71 federal operating permit for the Williams Four Corners, LLC (WFC) – E & H Receiver facility. This is an existing facility seeking its first operating permit to memorialize its operating parameters and establish air emission limits. The permit does not authorize any new construction at the source.

Since the WFC E & H Receiver began operations in 1974, both the operations and the potential to emit have remained unchanged. WFC reports that natural gas production in the San Juan basin has increased in recent years. This permit will reflect the increased through-put to the E & H Receiver facility. The conditions in the permit will be similar to those outlined by 40 CFR § 63 Subpart HH for storage vessels with the potential for flash emissions and equipment leaks.

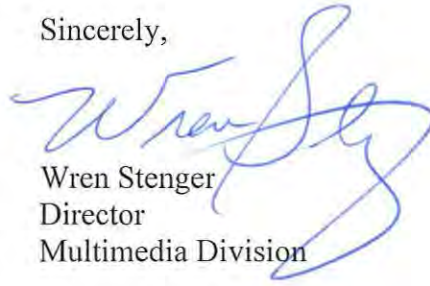
Company	General Project Description	Location
Williams Four Corners, LLC	Natural gas receiver tanks, associated equipment and loading operations	San Juan Basin 36.499, -107.191

This consultation process will be conducted in accordance with the *EPA Policy on Consultation and Coordination with Indian Tribes* (<http://www.epa.gov/tribal/epa-policy-consultation-and-coordination-indian-tribes>). EPA's anticipated timeline for the consultation and coordination period is expected to extend from the date of receipt of this letter to April 29, 2017.

You may review a copy of the WFC E & H Receiver permit application on EPA's website at: <https://www.epa.gov/caa-permitting/part-71-operating-permits-tribal-lands-epas-south-central-region>. There, you will be able to obtain more specific information about the location and the potential air emissions from the facility.

Should you have questions about this action or would like to request alternative arrangements to the process outlined in the consultation plan, please contact Jeff Robinson at (214) 665-6435. If you have other questions or wish to engage in government-to-government consultation, please contact Randy Gee, Office of Environmental Justice and Tribal Affairs Associate Director at (214) 665-8355. You may also contact Randy Gee for any questions about the consultation and coordination process. I look forward to hearing from you on this important matter, and respectfully ask for a response to this letter by March 7, 2017, on whether you desire to consult on this potential permit action.

Sincerely,



Wren Stenger
Director
Multimedia Division

Enclosure

cc: Cordell TeCube, Environmental Director
cltecube@yahoo.com

ENCLOSURE

Tribal Consultation and Coordination Process & Timeline

Step	Date	Event	Contacts
1	February 14, 2017	Consultation Letter Invite to Tribal Nations	Kyndall Cox EPA Region 6 1445 Ross Avenue Suite 1200 Dallas, TX 75202 cox.kyndall@epa.gov 214-665-8567
2	March 7, 2017	Tribal Responses: Yes or No for consultation	
3	March 29, 2017	30-day Public Notice begins	
4	April 29, 2017	End of consultation assuming all issues resolved	Randy Gee EPA Region 6 1445 Ross Avenue Suite 1200 Dallas, TX 75202 gee.randy@epa.gov 214-665-8355
5	May 7, 2017	Final Permit Issuance and Effective date of permit if no request for public hearing or no comments on draft permit	
6	TBD	Final Permit Issuance if public comments or request for public hearing. EPA response to comments developed by EPA air permits staff.	
7	TBD	Final permit issued and effective on date issued if no hearing/public comments. (depends upon whether request for public hearing and nature/extend of public comments), otherwise 30 days after issuance.	

Executive Summary for WFC E & H Receiver

The WFC E & H Receiver (facility) began operations in 1974. The facility located on the Jicarilla Apache Reservation in Rio Arriba County, New Mexico. The facility is located on a natural pipeline, and receives pipeline condensate and transfers to three storage tanks pending truck haul. The majority of the emissions are from the three storage tanks and truck loading operations.

An aggregation analysis was conducted as required by the 2016 oil and gas regulation¹. Based on the application resubmitted in August 2016 and supplemental information provided by WFC in November 2016, WFC does not own or operate any of the oil and gas wells within a quarter-mile radius of the E & H Receiver. No additional sources will be aggregated for this permit.

Process Operations:

The E & H Receiver is a natural gas liquids receiver on a natural gas pipeline. The receiver collects liquids (consisting of water and hydrocarbons condensed from natural gas) removed from the pipeline by pigging operations. As liquids are transferred from the receiver to the atmospheric storage tanks, hydrocarbons including volatile organic compounds (VOCs) may be released to the atmosphere.

See the application for further discussion and schematics on the operation of the facility.

Location:

The compressor station is located in Rio Arriba County at: 36.499 latitude and -107.191 longitude.

Air Quality Impact:

The Rio Arriba and neighboring counties are all in an attainment area for all criteria pollutants. Since there will be no additional emissions from this facility, the continued operation of this facility will have no or a minimal impact to the air quality in the area.

Environmental Justice Considerations

Executive Order (EO) 12898 (59 FR 7629 (Feb. 16, 1994)) establishes federal executive policy on environmental justice. Its main provision directs federal agencies, to the greatest extent practicable and permitted by law, to make environmental justice part of their mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority populations and low-

¹ Final Rule on oil and gas aggregation 81 FR 35622 available at: <https://www.federalregister.gov/documents/2016/06/03/2016-11968/source-determination-for-certain-emission-units-in-the-oil-and-natural-gas-sector>

income populations in the United States. This is an existing operation and the permit will not authorize any new emissions; therefore, EPA believes there will be minimal or no additional impact as result of its continued operation.



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REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

FEB 14 2017

The Honorable Russell Begaye
President of the Navajo Nation
P.O. Box 7440
Window Rock, Arizona 86515

RE: Initial Title V Permit for Williams Four Corners, LLC – E & H Receiver

Dear President Begaye:

The Environmental Protection Agency (EPA) Region 6 is in the process of drafting a Part 71 federal operating permit for the Williams Four Corners, LLC (WFC) – E & H Receiver facility. This is an existing facility seeking its first operating permit to memorialize its operating parameters and establish air emission limits. The permit does not authorize any new construction at the source.

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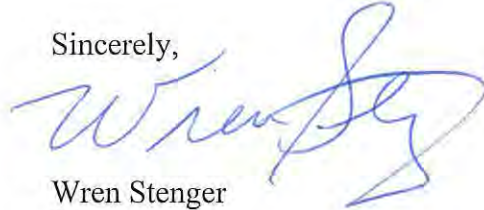
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Williams Four Corners, LLC	Natural gas receiver tanks, associated equipment and loading operations	San Juan Basin 36.499, -107.191

EPA is initiating consultation with the Jicarilla Apache Nation on this permit application. This consultation process will be conducted in accordance with the *EPA Policy on Consultation and Coordination with Indian Tribes* (<http://www.epa.gov/tribal/epa-policy-consultation-and-coordination-indian-tribes>). EPA invites you and your designated consultation representative(s) to participate in this process. EPA’s anticipated timeline for the consultation and coordination period is expected to extend from the date of receipt of this letter to April 29, 2017.

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Sincerely,



Wren Stenger
Director
Multimedia Division

Enclosure

cc: Dr. Donald Benn, Executive Director of NNEPA
donbenn@navajo-nsn.gov



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

FEB 14 2017

The Honorable Clement Frost
Chairman of the Southern Ute Indian Tribe
P.O. Box 737
Ignacio, Colorado 81137-0737

RE: Initial Title V Permit for Williams Four Corners, LLC – E & H Receiver

Dear Chairman Frost:

The Environmental Protection Agency (EPA) Region 6 is in the process of drafting a Part 71 federal operating permit for the Williams Four Corners, LLC (WFC) – E & H Receiver facility. This is an existing facility seeking its first operating permit to memorialize its operating parameters and establish air emission limits. The permit does not authorize any new construction at the source.

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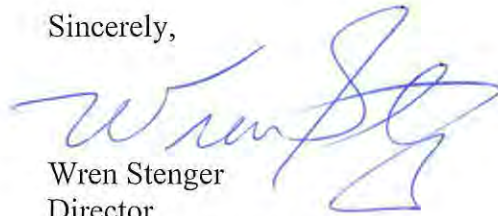
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Wren Stenger
Director
Multimedia Division

Enclosure

cc: Mark Hutson, Air Quality Program Manger
mhutson@southernute.nsn.gov



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

FEB 14 2017

The Honorable Joseph A. Toya
Governor of the Pueblo of Jemez
P.O. Box 100
Jemez, New Mexico 87024

RE: Initial Title V Permit for Williams Four Corners, LLC – E & H Receiver

Dear Governor Toya:

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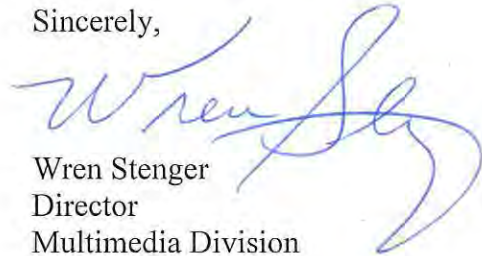
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Sincerely,

A handwritten signature in blue ink, appearing to read "Wren Stenger". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Wren Stenger
Director
Multimedia Division

Enclosure

cc: Paul Clarke, Environmental Director
paul.clarke@jemezpuablo.org