

**From:** Hannan, Michael [mailto:Michael.Hannan@Williams.com]  
**Sent:** Wednesday, October 11, 2017 5:45 PM  
**To:** LeDoux, Erica <LeDoux.Erica@epa.gov>  
**Cc:** Myers, Robert <bmyers@cirrusllc.com>; Morris, Mitch <Mitch.Morris@williams.com>  
**Subject:** RE: Ojito Compressor Station Voicemail Follow-up

Hi Erica,

Thank you for your assistance with our application to modify the Ojito Compressor Station such that the facility will be permitted as a minor NSR source and no longer need its Part 71 Title V application. As discussed, it's been determined that the October 3, 2017 minor NSR application revision had some incorrect information indicated on the forms. In particular, Section 2 of the "*Evaluation of Threatened and Endangered Species and Historic Properties for New or Modified Oil and Natural Gas Minor Sources in Indian Country Complying with the Oil and Natural Gas Minor Source Federal Implementation Plan*" (Evaluation) had indicated the incorrect criterion for which the threatened or endangered species were evaluated.

The Evaluation in the revised application submittal should have indicated that the threatened and endangered species were evaluated under criterion A, as originally submitted. The facility is an existing facility, originally constructed prior to 1976. The proposed project action area in which we will replace the existing compressor engine packages with a single compressor package will occur within the existing fenceline. It was decided during the site evaluation that the new compressor package will be placed on an existing, unused concrete pad where a turbine was location in the 1980s (and subsequently removed during the 1990s under NMED permitting). As such, there will be no ground disturbance. Please place into the revised application package this first page of the Evaluation found in the original submittal indicating that criterion A was the criterion appropriate for this Evaluation.

I'm happy to help you keep this application process moving forward during Mitch's absence from the office. As you know, he will be back in the office on Thursday October 12<sup>th</sup> to continue working with you on this project.

Thanks,

**From:** Morris, Mitch  
**Sent:** Tuesday, September 19, 2017 10:34 AM  
**To:** 'LeDoux, Erica' <LeDoux.Erica@epa.gov>  
**Cc:** Myers, Robert <bmyers@cirrusllc.com>  
**Subject:** Ojito Compressor Station Voicemail Follow-up

Erica,

Thank you for your voicemail on Friday. I believe I've captured all of the questions you asked. Please find below responses to assist in determining the appropriate path for Williams' proposed compression repairs at Ojito.

1. Provide documentation demonstrating that existing compressors/engines are inoperable:

*The attached Management of Change (MOC) Form documents in Section 1, Change of Scope, that the damaged compressors have been completely isolated at the pipeline inlet and outlet, and from the fuel gas. This MOC was placed into service immediately following the incident (July 20, 2017) and was closed on July 31, 2017.*

2. Is the facility footprint remaining the same?

*The facility's footprint will be unchanged. The actual location of the replacement compressor skid will be determined in the upcoming site analysis, scheduled for Friday, September 22. It may be set in one of the three existing slots, or possibly on an existing, unused concrete pad where a turbine was located in the 1980's (and removed during the 1990's under NMED permitting).*

3. Timeline –

*A site analysis will take place this coming Friday, September 22. If EPA's applicability determination allows immediate construction, Williams will begin procurement of the compressor skid and begin site preparation by the end of this month, with the new compressor in operation in December. Concurrently, an application for the replacement compressor skid will be prepared, in accordance with EPA's findings in the applicability determination.*

4. Will there be any change to the storage tanks?

*The only change to tankage at the facility will be the addition of one lube oil tank and one used lube oil tank, each with a 500-gallon capacity, for the new compressor skid. These will be Title V insignificant emission sources. The lube oil tanks associated with the existing compressor engines will be disconnected and removed from service.*

Thank you for your assistance with this application process. As always, feel free to call or email with any additional questions or if clarification is needed.

Thanks,



**Mitch Morris** | Williams | Environmental Specialist | Operational Excellence  
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