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Enforcement and Compliance
Assurance Division

XTO ENERGY

October 1, 2019

UPS Tracking 1Z6T3671NY94081552

U.S. Environmental Protection Agency
U.S. EPA – Enforcement Division
1595 Wynkoop (8P-AR)
Denver, CO 80202

RE: XTO Energy Inc.
1H 2019 Title V Semi-Annual Deviation Reports – Tap 5 Compressor Station, Little Canyon Compressor Station, River Bend Dehydration Site

Dear Administrator:

XTO Energy Inc. (XTO) hereby submits the initial Compliance and Deviation Report for each of the facilities listed below. This report satisfies the regulatory reporting requirement from January 1, 2019 until June 30, 2019.

- **Tap 5 Compressor Station: Permit # V-UO-000018-2007.00**
- **Little Canyon Compressor Station: Permit # V-UO-000016-2006.00**
- **River Bend Dehydration Site: Permit # V-UO-000026-2011.00**

In the event you have any questions or need additional information, please contact Allison Ginger at (832) 625-4212 or by email at allison_ginger@xtoenergy.com.

Sincerely,

Allison Ginger
Environmental Engineer
XTO Energy Inc.

United States Environmental Protection Agency

OMB No. 2060-0336,

Approval Expires 05/31/2019

Federal Operating Permit Program (40 CFR Part 71)
6-MONTH MONITORING REPORT (SIXMON)

Section A (General Information)

Permit No. V-U0-000026-2011.00

Reporting Period: Beg.01 / 01 / 2019 End.06 / 30 / 2019

Source / Company Name River Bend Dehydration Site/ XTO Energy Inc

Mailing Address:

Street or P.O. Box _Wellness 4.6B.355 22777 Springwoods Village Pkwy

City Spring State TX ZIP 77389-

Contact person Allison Ginger Title Environmental Engineer

Telephone (832) 625 – 4212 Ext. _____

Continued on next page

United States Environmental Protection Agency

CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 70 or 71 permit).

A. Responsible Official

Name: (Last) **Givens** (First) **Brian** (MI) ____

Title **XTO Energy Inc. - Manager of Operations - Rockies Division**

Street or P.O. Box **110 West 7th Street**

City **Fort Worth** State **TX** ZIP **76102** - ____

Telephone **(817) 624-7830** Ext. ____ Facsimile

B. Certification of Truth, Accuracy and Completeness (to be signed by the responsible official).

I certify under penalty of law that this document and all attachments were prepared under my supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete.

Name (signed) Brian Givens

Name (typed) **Brian Givens** Date: 9 / 20 / **2019**

INSTRUCTIONS FOR CTAC
CERTIFICATION OF TRUTH, ACURACY, and COMPLETENESS

This form is for the responsible official to certify that submitted documents (i.e., permit applications, updates to application, reports, and any other information required to be submitted as a condition of a permit) are true, accurate, and complete.

This form should be completed and submitted with each set of documents sent to the permitting authority. It may be used at time of initial application, at each step of a phased application submittal, for application updates, as well as to accompany routine submittals required as a term or condition of a permit.

Section A - Title V permit applications must be signed by a responsible official. The definition of responsible official can be found at ' 70.2.

Section B - The responsible official must sign and date the certification of truth, accuracy and completeness. This should be done after all application forms are complete and the responsible official has reviewed the information. Normally this would be the last form completed before the package of forms is mailed to the permitting authority.

Section B (Monitoring Report)

Summarize all required monitoring, data, or analyses required by the permit for the reporting period. Describe and cross-reference the permit term and list the emission units (Unit IDs) where the monitoring was performed. Indicate whether a separate monitoring report is required, and if required, enter the date submitted. If submitted for the first time as an attachment to this form, assign an attachment ID, mark the attachment with that ID, and attach the report to this form.

Monitoring, Data, or Analysis (describe and cite): **§63.773** (c) *Cover and closed-vent system inspection and monitoring requirements*
(i) For each closed-vent system joints, seams, or other connections that are permanently or semi-permanently sealed (e.g., a welded joint between two sections of hard piping or a bolted and gasketed ducting flange), the owner or operator shall:
(A) Conduct an initial inspection according to the procedures specified in §63.772(c) to demonstrate that the closed-vent system operates with no detectable emissions. Inspection results shall be submitted with the Notification of Compliance Status Report as specified in §63.775(d)(1) or (2).

XTO conducted initial inspections on permanently sealed components based on the methods specified in §63.772(c).

Emission Units (Unit IDs): RBD-1 (45 MMscfd TEG Dehydration Unit)

Separate Report? ___ Yes _X __ No Date____/___/_____ Attachment ID _____

Monitoring, Data, or Analysis (describe and cite): **§63.773** (c) *Cover and closed-vent system inspection and monitoring requirements*
(i) For each closed-vent system joints, seams, or other connections that are permanently or semi-permanently sealed (e.g., a welded joint between two sections of hard piping or a bolted and gasketed ducting flange), the owner or operator shall:
(B) Conduct annual visual inspections for defects that could result in air emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in piping; loose connections; or broken or missing caps or other closure devices. The owner or operator shall monitor a component or connection using the procedures in §63.772(c) to demonstrate that it operates with no detectable emissions following any time the component is repaired or replaced or the connection is unsealed. Inspection results shall be submitted in the Periodic Report as specified in §63.775(e)(2)(iii).

XTO continues to conduct annual visual inspections on all permanently sealed components.

Emission Units (Unit IDs): RBD-1 (45 MMscfd TEG Dehydration Unit)

Separate Report? ___ Yes _ X__ No Date____/___/_____ Attachment ID _____

Monitoring, Data, or Analysis (describe and cite): **§63.773** (c) *Cover and closed-vent system inspection and monitoring requirements*
(ii) For closed-vent system components other than those specified in paragraph (c)(2)(i) of this section, the owner or operator shall:
(A) Conduct an initial inspection according to the procedures specified in §63.772(c) to demonstrate that the closed-vent system operates with no detectable emissions. Inspection results shall be submitted with the Notification of Compliance Status Report as specified in §63.775(d)(1) or (2).

XTO conducted initial inspections on all other components based on the methods specified in §63.772(c).

Emission Units (Unit IDs): RBD-1 (45 MMscfd TEG Dehydration Unit)

Separate Report? ___ Yes _X__ No Date____/___/_____ Attachment ID _____

Monitoring, Data, or Analysis (describe and cite): **§63.773** (c) *Cover and closed-vent system inspection and monitoring requirements*
(ii) For closed-vent system components other than those specified in paragraph (c)(2)(i) of this section, the owner or operator shall:
(B) Conduct annual visual inspections for defects that could result in air emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in piping; loose connections; or broken or missing caps or other closure devices. The owner or operator shall monitor a component or connection using the procedures in §63.772(c) to demonstrate that it operates with no detectable emissions following any time the component is repaired or replaced or the connection is unsealed. Inspection results shall be submitted in the Periodic Report as specified in §63.775(e)(2)(iii).

XTO continues to conduct annual inspections on all other components based on the methods specified in §63.772(c).

Emission Units (Unit IDs): RBD-1 (45 MMscfd TEG Dehydration Unit)

Separate Report? ___ Yes _ X__ No Date____/___/_____ Attachment ID _____

Monitoring, Data, or Analysis (describe and cite): **§63.773** (c) *Cover and closed-vent system inspection and monitoring requirements.* (d) *Control device monitoring requirements.*

XTO has installed and calibrated, as well as operates and maintains a continuous parameter monitoring system (CPMS) on the thermal oxidizer control device for the glycol dehydrator consistent with the requirements of **§63.773 (d).**

Emission Units (Unit IDs): RBD-1 (45 MMscfd TEG Dehydration Unit)

Separate Report? ___ Yes _X__ No Date____/___/_____ Attachment ID _____

Monitoring, Data, or Analysis (describe and cite): **§63.6625** Monitoring, installation, collection, operation, and maintenance requirements

XTO complies with the applicable requirements of **§63.6625**

Emission Units (Unit IDs): T1C-1 & T1C-2

Separate Report? ___ Yes _X__ No Date____/___/_____ Attachment ID _____

Section C (Deviations Already "Promptly" Reported)

Summarize all deviations from permit terms already reported on form **PDR** during the reporting period. Copy this page as many times as necessary to include all such deviations. Describe and cross-reference the permit terms and report the start and end dates and times of the deviations (mo/day/yr, hr:min). Use the 24-hour clock. Also specify the date when the written deviation report was submitted to the permitting authority (If written report required, but not submitted, leave the date field blank). Note that failure to submit a deviation report, or late submittal, is a deviation that must be reported in the Section D.

Permit Term for Which There was a Deviation:

Emission Units (unit IDs):

Deviation Start _____/_____/_____ ____:____ End:_____/_____/_____ ____:____

Date Written Report Submitted ____/____/_____

Permit Term for Which There was a Deviation:

Emission Units (unit IDs):

Deviation Start _____/_____/_____ ____:____ End:_____/_____/_____ ____:____

Date Written Report Submitted ____/____/_____

Permit Term for Which There was a Deviation:

Emission Units (unit IDs):

Deviation Start _____/_____/_____ ____:____ End:_____/_____/_____ ____:____

Date Written Report Submitted ____/____/_____

Permit Term for Which There was a Deviation:

Emission Units (unit IDs):

Deviation Start _____/_____/_____ ____:____ End:_____/_____/_____ ____:____

Date Written Report Submitted ____/____/_____

Section D (Deviations Reported Semiannually)

This section is for deviations reported for the first time in this six-month monitoring report. Describe and cross-reference the permit terms and emission units that apply to the deviation. Copy this page as many times as necessary to include all such deviations. Report the beginning and ending times (mo/day/yr, hr:min) for each deviation. Use the 24-hour clock. Briefly explain (if known) the probable cause of each deviation. If any corrective actions or preventative measures have been taken to avoid these in the future, briefly describe the measures, including when they occurred.

Permit Term (for Which There is a Deviation):

Emission Units (unit IDs)

Deviation Start: ____/____/_____ ____ :____ End: ____/____/_____ ____:____

Probable Cause of Deviation:

Corrective Actions or Preventative Measures Taken:

Permit Term (for Which There is a Deviation):

Emission Units (unit IDs)

Deviation Start: ____/____/_____ ____:____ End: ____/____/_____ ____:____

Probable Cause of Deviation:

Corrective Actions or Preventative Measures Taken:

Permit Term (for Which There is a Deviation):

Emission Units (unit IDs)

Deviation Start: ____/____/_____ ____:____ End: ____/____/_____ ____:____

Probable Cause of Deviation:

Corrective Actions or Preventative Measures Taken: