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XTO ENERGY

September 28, 2018

RECEIVED

OCT 2 - 2018

Office of Enforcement
Compliance & Environmental Justice

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

RE: XTO Energy Inc.
1H 2018 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 1st, 2018 until June 30, 2018.

- **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 Ethan Boor - Environmental Engineer at (832) 625-0106 or by email at ethan_boor@xtoenergy.com.

Sincerely,

EHB

Ethan Boor
Environmental Engineer
XTO Energy Inc.

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) **Hermann** (First) **Timothy** (MI) **L**

Title **XTO Energy Inc. - Manager of MSO Western Division Operations**

Street or P.O. Box **22777 Springwoods Village Pkwy**

City **Spring** State **TX** ZIP **77389** - _____

Telephone **(832) 625-0125** 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) Timothy L. Hermann

Name (typed) **Timothy L. Hermann** Date: 9 / 27 / **2018**

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-U0-000018-2007.00

Reporting Period: Beg.01 / 01 / 2018 End.06 / 30 / 2018

Source / Company Name ___ Tap 5 Compressor Station/ 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 __Ethan Boor__ Title Environmental Engineer

Telephone (832) 625 - 0106_ Ext. _____

Continued on next page

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): T5D-1 (40 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): T5D-1 (40 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): T5D-1 (40 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): T5D-1 (40 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): T5D-1 (40 MMscfd TEG Dehydration Unit)

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

Monitoring, Data, or Analysis (describe and cite): **III C. 1. Compliance with the operating limitations in §63.6600 (b) of 40 CFR part 63, ZZZZ**

XTO complies with the operating/maintenance requirements **§63.6600 (b)** of 40 CFR part 63 ZZZZ.

Emission Units (Unit IDs): T5C-2 & T5BC-2

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

Monitoring, Data, or Analysis (describe and cite): **III C. 2. Compliance with the operating limitations in §63.6603 (a) of 40 CFR part 63, ZZZZ**

XTO complies with the operating/maintenance requirements **§63.6603 (a)** of 40 CFR part 63 ZZZZ.

Emission Units (Unit IDs): RBU 11-2F PU

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

Monitoring, Data, or Analysis (describe and cite): **III C. 3. Compliance with the emission limitations, operating limitations and other requirements established in 40 CFR part 63, ZZZZ**

XTO complies with the requirements of 40 CFR part 63 ZZZZ.

Emission Units (Unit IDs): RBU 11-2F PU, T5C-2 & T5BC-2

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

Monitoring, Data, or Analysis (describe and cite): **III C. 4. Compliance with the numerical emission limitations for affected sources at major source of HAP established in 40 CFR par 63, ZZZZ shall be based on the results of testing the average of (3) 1-hour runs using the testing requirements and procedures in §63.6620 and Table 4 of subpart ZZZZ.**

XTO complies with the testing requirements of under above permit condition and submits the results of each test.

Emission Units (Unit IDs): T5C-2 & T5BC-2

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

Monitoring, Data, or Analysis (describe and cite): **III C. 5. Safety & good air pollution practices**

XTO complies with the permit requirement to operate equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times.

Emission Units (Unit IDs): RBU 11-2F PU, T5C-2 & T5BC-2

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

Monitoring, Data, or Analysis (describe and cite): **III D. 1. Initial Performance Testing under §63.6610**

XTO conducted initial performance tests for the engines and submitted reports to the EPA.

Emission Units (Unit IDs): T5C-2 & T5BC-2

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

Monitoring, Data, or Analysis (describe and cite): **III D. 2. Performance Testing under §63.6615**

XTO conducts periodic performance tests for the engines and submits the reports to the EPA.

Emission Units (Unit IDs): T5C-2 & T5BC-2

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

Monitoring, Data, or Analysis (describe and cite): **III D. 3. Performance Testing procedures under §63.6620**

XTO conducts periodic & initial performance tests for the engines using the procedures required under **§63.6620**.

Emission Units (Unit IDs): T5C-2 & T5BC-2

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

Monitoring, Data, or Analysis (describe and cite): **III D. 4. Monitoring, installation, collection, operation and maintenance requirements under §63.6625**

XTO performs the monitoring, installation, collection and operation/maintenance requirements that are required under **§63.6625.**

Emission Units (Unit IDs): T5C-2 & T5BC-2

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

Monitoring, Data, or Analysis (describe and cite): **III D. 5. Maintenance requirements under §63.6625**

XTO utilizes the oil analysis program under **§63.6625(j).**

Emission Units (Unit IDs): RBU 11-2F PU

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

Monitoring, Data, or Analysis (describe and cite): **III E. 1. Data Monitoring and Collection §63.6635**

XTO records and monitors the required data for each engine using a CPMS as required under **§63.6635. The data is automated to be logged into XTO's SCADA system.**

Emission Units (Unit IDs): T5C-2 & T5BC-2

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

Monitoring, Data, or Analysis (describe and cite): **III E. 2. Continuous compliance demonstration §63.6640**

XTO demonstrates continuous compliance as required under **§63.6640.**

Emission Units (Unit IDs): T5C-2 & T5BC-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:

INSTRUCTIONS FOR SIXMON
6-MONTH MONITORING REPORT

Information Collection Burden Estimates

The public reporting and recordkeeping burden for this collection of information is estimated to average 247 hours per respondent per year. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

DETAILED INSTRUCTIONS

Section A (General Information)

The contact person should be a person familiar with the day-to-day operation of the facility, such as a plant site manager, who should be available to be contacted by the permitting authority. If there is more than one contact person, list the others on an attachment.

Section B (Monitoring Report)

Summarize all monitoring required during the reporting period and provide information on any separate monitoring reports submitted at this time or any time during the reporting period. Each individual monitoring requirement should be included in a separate row of the table. Copy section C of this form as many times as necessary to address all monitoring requirements.

Describe and cross-reference the relevant permit term that requires monitoring, data collection or analysis. Be specific with regard to test methods or analytical techniques used, and the air pollutant or parameter monitored. The cross-reference to the permit term should be as precise as possible.

Monitoring is a method of assuring compliance with permit terms. Monitoring may include instrumental or non-instrumental methods, including continuous emissions monitoring, periodic readings of parameters related to operating conditions, stack tests using EPA reference test methods, vendor or laboratory analytical testing, manual inspections, visual observations, work practice checks, and recordkeeping that confirms a requirement has been met.

You may list multiple units if all are subject to the same monitoring requirements. In addition, for monitoring that applies to the permitted facility as a whole or to all units at your source, you may enter "facility-wide" in the emissions unit column.

Indicate whether a separate report is required for the monitoring described above. If a separate report was submitted prior to the submittal of this form, indicate the date; if it is being submitted for the first time with this form, assign an attachment ID in the space provided, mark the attachment accordingly, and attach the separate monitoring report to this form.

Section C (Deviations Already "Promptly" Reported)

Summarize all deviations from permit terms reported in writing prior to the submittal of this monitoring report, such as those reported using **PDR**. Include all deviations that were required to be reported, but not reported or not reported by the deadline. Note that all deviations that occurred during the reporting period should be reported either in this section or in section D.

Deviations from permit terms occur when any permit term is not met, including emission control

requirements and compliance assurance methods (monitoring, recordkeeping, and reporting). For example, the following are examples of deviations: (1) emissions that exceed an emission limit; (2) parameter value that indicates that an emission limit has not been met; (3) observations or data that show noncompliance with a limitation or other requirement; (4) an exceedance or excursion as defined in 40 CFR part 64 (CAM); (5) required monitoring that is not performed; and (6) failure to submit a report. You also must include deviations from permit terms that occur during startup, shutdown, malfunction, and upset conditions. A deviation is not necessarily a violation; violations will be determined by EPA (or its delegate Agency).

You may list multiple emission units here if they all had deviations of this permit term and they all occurred during the same time periods. In addition, you may enter "facility-wide" in the emissions unit column, if appropriate.

You may indicate continuous periods of deviation that span multiple days in a single entry. Use the 24-hour clock (equivalent to military time) for reporting these times (e.g., the day starts and ends at midnight, 12 a.m., or 00:00 in military time.

Specify the date when the written deviation report was submitted to the permitting authority. Leave the date field blank if you did not submit a written report during the reporting period.

It is a deviation to submit a required deviation report (whether required by telephone, fax, or in writing within 24 or 48 hours) after the deadline or to neglect to submit it at. Such deviations must be reported in Section D.

"Emergencies" (as defined in part 71) are also considered deviations. However if the reporting requirements of part 71 for emergences are met, they may not necessarily result in noncompliance. Note that although the terms "upset," "startup," "shutdown" and "malfunction" refer to conditions that are not defined in part 71, the applicable requirements may define these terms, and all deviations during such conditions are deviations. Also, note that the applicable requirement itself may define the term "deviation" or refer to "excess emissions" and any such occurrences should also be reported as deviations on this form.

Section D (Deviations Reported Semiannually)

Report those deviations required to be reported for the first time in this 6-month monitoring report. Note that all deviations not included in section C should be included here. Copy this page as many times as necessary to report all such deviations.

Cross-reference the permit term for which there is a deviation and describe the requirement.

List the emission units (Unit IDs) where this deviation occurred. You may list multiple units here if they all had deviations of this permit term and they all occurred during the same time periods. In addition, for deviations of permit terms that impose requirements to the permitted facility as a whole or to all units at your facility, you may enter "facility-wide" in the emissions unit column.

Identify the time period (beginning and ending) over which the deviation occurred. You may indicate continuous periods of deviation that span multiple days in a single entry. Use the 24-hour clock (equivalent to military time) for reporting these times (e.g., the day starts and ends at midnight, or 00:00 in military time.

Briefly explain the probable cause of the deviation from permit terms, if known. Examples of possible answers to this question include "operator error" or "mechanical failure." Be as specific as possible.

If any corrective actions or preventative measures were taken to avoid similar deviations at the same emissions units, briefly explain them. Examples of possible answers to this question include: "trained

operator on proper operation of control devices" or "repaired defective equipment and will perform routine maintenance on an accelerated schedule." If known, include dates when such actions or measures were taken or will be taken in the future.

Form CTAC (Certification of Truth, Accuracy, and Completeness by Responsible Official)

You must complete form **CTAC** and attach it to this monitoring report.