Mail To:		For Department use only:
New Mexico Environment Department Air Quality Bureau Permit Program Manager 525 Camino de los Marquez, Suite 1 Santa Fe, New Mexico, 87505 Phone (505) 476-4300 Fax (505) 476-4375 www.env.nm.gov/air-quality/		RECEIVED JAN 26 2026 Air Quality Bureau

Application Form for an Alternative Equipment Leak Monitoring Plan

The New Mexico Environment Department (NMED) developed this Application Form for evaluating proposed Alternative Equipment Leak Monitoring Plans (AELMP). AELMPs may include alternative monitoring methods, technologies, or procedures for use in lieu of, or in combination with, optical gas imaging (OGI) and/or EPA Method 21, for equipment leaks and fugitive emissions detection as required by Subsection D of 20.2.50.116 NMAC. Please note that NMED will not consider a proposed AELMP until it is has moved past the development, testing, or prototype phase and has repeatable proven or demonstrated success in hydrocarbon emission detection. Also note that NMED may require a field demonstration of a proposed AELMP, which should be arranged by the applicant. Submitting an application with missing or incomplete information will result in the application being determined technically incomplete and will result in a denial of the proposal by NMED.

This Application is being submitted as:

☒ A request for review and approval by NMED of a new AELMP
☐ A request to operate under a pre-approved AELMP previously approved by NMED

SECTION 1 – COMPANY INFORMATION		
1)	Company Name: XTO Energy, Inc.	
	Mailing Address: 3104 E Greene St. Carlsbad, NM 88220	
2)	Company Contact Name: Jeffrey Myhra	Phone/Fax: 737-272-1353
	Mailing Address: 3104 E Greene St. Carlsbad, NM 88220	E-mail: jeffrey.t.myhra@exxonmobil.com
3)	☐ Preparer ☒ Consultant Trinity Consultants Inc.	Phone/Fax: (505) 266-6611
	Mailing Address: 9400 Holly Ave NE, Bldg. 3, Ste. B, Albuquerque, NM 87122	E-mail: Michael.Brown@trinityconsultants.com

SECTION 2 – ALTERNATIVE MONITORING METHOD AND/OR TECHNOLOGY INFORMATION	
4)	Is the AELMP leak detection technology commercially available? ☐ **Yes** ☐ **No** ☒ **N/A**
5)	Will the proposed AELMP leak detection technology be offered for sale, rental, or contracted service (please specify all that apply)? ☐ **Sale** ☐ **Rental** ☐ **Contracted Service** ☒ **N/A**
6)	Name of AELMP leak detection technology: N/A – XTO will continue to use U.S. EPA Method 21 and optical gas imaging (OGI) as the primary leak detection technologies.
7)	Please specify the AELMP leak detection technology platform (check all that apply): ☐ **Handheld** ☐ **Mobile** ☐ **Aerial** ☐ **Satellite** ☐ **Stationary** ☐ **Other:** ☒ **N/A**

8)	Is the AELMP leak detection technology capable of continuous monitoring? ☐ Yes ☐ No ☒ N/A
8a)	If "no," please provide the monitoring frequency: N/A - XTO will continue to conduct annual U.S. EPA Method 21 surveys and monthly OGI leak detection inspections.
9	Is the AELMP approved by another regulatory authority? ☐ Yes ☐ No ☒ N/A
9a)	If "yes", please provide the name of the regulatory authority and indicate the application the AELMP was approved for. N/A – U.S. EPA Method 21 and OGI are accepted as the primary leak detection technologies by the New Mexico Environment Department per 20.2.50.116.C.(3) NMAC.
10)	Please describe the capabilities of the AELMP (for example: pollutants detected, detection limits in ppm or kg/hr, probability of detection, spatial resolution, detection technology, etc.), any limitations that may impact the AELMP performance (for example: distance, topography, wind speed, temperature, precipitation, etc.), as well as any other restrictions on use (please provide supporting data or information): N/A – XTO will continue to use U.S. EPA Method 21 and OGI as the primary leak detection technologies. Therefore, there is no deviation in the capabilities, limitations, or restrictions of these technologies.
11)	Please describe how the AELMP will be used to identify leaks and how individual leaks will be identified (e.g. use of ground-level OGI or Method 21 procedures) and repaired, the leak repair schedule, and any follow-up actions: XTO will utilize U.S. EPA Method 21 and OGI procedures to identify leaks from equipment components subject to 20.2.50.116 NMAC. All detected leaks will be tagged and documented per 20.2.50.116.E.(1) NMAC. If the leak cannot be repaired within 30 days of discovery without a process unit shutdown, the leak may be designated "Repair delayed" in accordance with 20.2.50.116.E.(4) NMAC. While 20.2.50.116.E.(4) NMAC requires repair before the end of the scheduled process unit shutdown or within 2 years, whichever is earlier, XTO respectfully requests approval to delay repairs designed "Repair delayed" under 20.2.50.116.E.(4) NMAC until the next scheduled process unit shutdown. Shutting down the cryo system outside of its scheduled shutdown date would necessitate flaring blowdown gas and venting residual gas, resulting in significantly higher emissions than if the leak repair(s) were deferred until the next scheduled shutdown. Therefore, XTO proposes to repair such leaks during the next scheduled cryo shutdown event. All delayed repairs will be completed during the next scheduled shutdown and, in accordance with 20.2.50.116(E)(3) NMAC, equipment will be re-monitored no later than 15 days after the repair of the leak to demonstrate that it has been repaired. All monitoring, leak identification, repair actions, and verification will be documented in accordance with 20.2.50.116(F) NMAC and facility-specific LDAR protocols.
12)	Please describe and provide documentation (e.g., field or test data, LDAR-Sim or FEAST modeling) showing how the proposed AELMP is capable of achieving emissions reductions that are at least as effective as the emission reductions achieved using OGI or EPA Method 21 monitoring instrument (attach supporting documentation): XTO will continue to use U.S. EPA Method 21 and OGI as the primary leak detection technologies. Therefore, there is no deviation in emission reductions achieved from using these technologies. XTO requests a delay in the repair schedule for identified fugitive leaks of the cryo trains. To support this request, XTO has prepared an emission comparison between a full cryo train shutdown and the extended emissions from fugitive leaks beyond the two-year regulatory repair timeline. The analysis demonstrates a net reduction in overall emissions of criteria pollutants (NO_x, CO, SO_2, PM_{10}, and $PM_{2.5}$), VOCs, and HAPs resulting from the proposed delayed repair schedule. Please see the supporting documentation.

13)	Please describe the frequency of measurements and data logging capabilities of the proposed AELMP (attach supporting documentation): XTO will continue to conduct annual U.S. EPA Method 21 surveys and monthly OGI leak detection inspections. Additionally, XTO will conduct Method 21 monitoring on leaks designated as "repair delayed" as specified in the alternative leak monitoring plan. Therefore there is no deviation in the frequency of measurements and data logging capabilities in the proposed AELMP.
14)	Please describe the data quality indicators for precision and bias of the proposed AELMP (attach supporting documentation): XTO will continue to use U.S. EPA Method 21 and OGI as the primary leak detection technologies. Additionally, XTO will conduct Method 21 monitoring on leaks designated as "repair delayed" and collect data as specified in Attachment 2. Therefore, there is no deviation in the data quality indicators for precision and bias in the proposed AELMP.
15)	Please describe the quality control and quality assurance procedures necessary to ensure proper operation of the proposed AELMP (attach supporting documentation): XTO will continue to use U.S. EPA Method 21 and OGI as the primary leak detection technologies. Additionally, XTO will conduct Method 21 monitoring on leaks designated as "repair delayed" and follow the quality control and quality assurance procedures as specified in this plan. Therefore, there is no deviation in quality control and quality assurance procedures.
16)	Please describe the training and/or certification required to operate and understand the proposed AELMP (attach supporting documentation): N/A – XTO will continue to use U.S. EPA Method 21 and OGI as the primary leak detection technologies. Therefore, there is no deviation in training and/or certification required to operate and understand these methods and technologies.

SECTION 3 – ADDITIONAL INFORMATION	
Please include the following with this application and mark or identify appropriately for review purposes. This application may be considered incomplete if the following are not included.	
17)	Supplemental information on the proposed AELMP. This information should be provided in easy-to-understand terms or language and should cover any of the requests for supporting data/information/documentation identified in Section 2. ☒ **Included**
18)	An Operation and Maintenance (O&M) Plan for the proposed AELMP that covers the following: • Standard operating procedures • Example recordkeeping format • Calibration and maintenance schedules for the AELMP ☐ **Included**

Certification

Company Name: XTO Energy Inc.

I, JEFFREY T. MYHRA, hereby certify that the information and data submitted in this Application are true and as accurate as possible, to the best of my knowledge and professional expertise and experience.

Signed this 19 day of January, 2026, upon my oath or affirmation, before a notary of the State of New Mexico.

*Signature

1-19-26
Date

JEFFREY T. MYHRA
Printed Name

NM Air Emissions Supervisor
Title

Scribed and sworn before me on this 19 day of January 2026.

My authorization as a notary of the State of New Mexico expires on the 4 day of September 2026.

Notary's Signature

1/19/26
Date

Miranda Jean Gean
Notary's Printed Name

MIRANDA JEAN GEAN
Notary Public - State of New Mexico
Commission # 1065681
My Comm. Expires Sep 4, 2026

AQB Internal Use Only	
☐ Approved ☐ Not Approved	Date:
Notes:	

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Attachment 2: Leak Tracking Template

DOR Leak Tracking Template

Current Total Emissions (lbs)	0.000

Date	Time	Leaking Component ID	Leaking Component Description	Delay of Repair Leak Tag ID	Leaking Component Type	Service	M21 instrument measurement (ppm)	Leak classification	Initial measurement or Quarterly measurement	Leak Rate (lb/hr)	Current Date	Current Emission Volume (lbs)	VOC Emissions (lbs)

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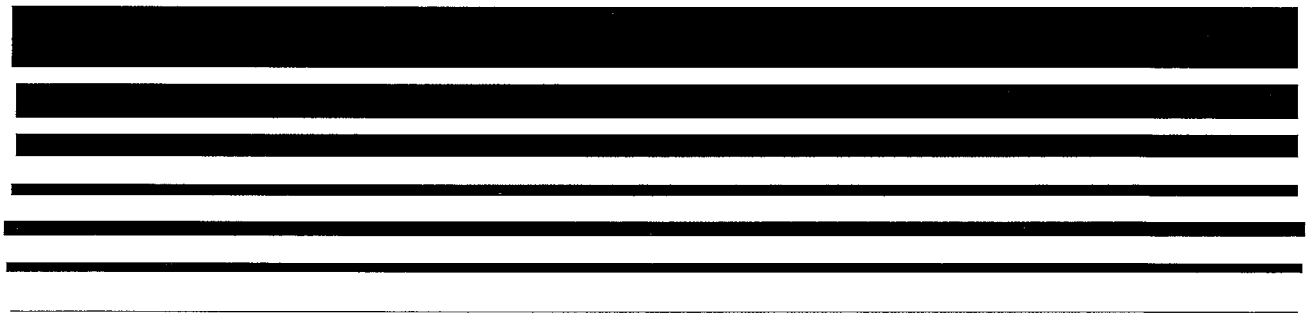
Attachment 3: EPA Protocol for Equipment Leak Emission Estimates

United States Environmental Protection Agency
Office of Air Quality Planning and Standards Research Triangle Park NC 27711
EPA-453/R-95-017 November 1995
Air

EPA

Protocol for Equipment Leak Emission Estimates



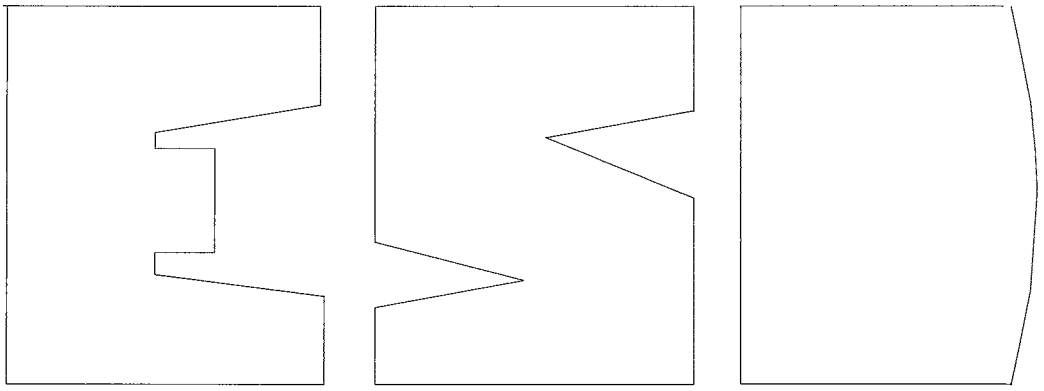


TABLE 2-8. OIL AND GAS PRODUCTION OPERATIONS SCREENING RANGES EMISSION FACTORS

Equipment type	Service[b]	≥10,000 ppmv Emission factor (kg/hr/source)[a]	<10,000 ppmv Emission factor (kg/hr/source)[a]
Valves	Gas	9.8E-02	2.5E-05
	Heavy Oil	NA	8.4E-06
	Light Oil	8.7E-02	1.9E-05
	Water/Oil	6.4E-02	9.7E-06
Pump seals	Gas	7.4E-02	3.5E-04
	Heavy Oil	NA	NA
	Light Oil	1.0E-01	5.1E-04
	Water/Oil	NA	2.4E-05
Others[c]	Gas	8.9E-02	1.2E-04
	Heavy Oil	NA	3.2E-05
	Light Oil	8.3E-02	1.1E-04
	Water/Oil	6.9E-02	5.9E-05
Connectors	Gas	2.6E-02	1.0E-05
	Heavy Oil	NA	7.5E-06
	Light Oil	2.6E-02	9.7E-06
	Water/Oil	2.8E-02	1.0E-05
Flanges	Gas	8.2E-02	5.7E-06
	Heavy Oil	NA	3.9E-07
	Light Oil	7.3E-02	2.4E-06
	Water/Oil	NA	2.9E-06
Open-ended lines	Gas	5.5E-02	1.5E-05
	Heavy Oil	3.0E-02	7.2E-06
	Light Oil	4.4E-02	1.4E-05
	Water/Oil	3.0E-02	3.5E-06

[a]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 offshore facilities. "NA" indicates that not enough data were available to develop the indicated emission factor.

[b]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.

[c]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.

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Attachment 4: Example of Leak Tracking Template (Cryo Trains 1-4)

Cryo Train 1 - DOR Leak Tracking

Current Total Emissions (lbs)	3.889

Date	Time	Leaking Component ID	Leaking Component Description	Delay of Repair Leak Tag ID	Leaking Component Type	Service	M21 instrument measurement (ppm)	Leak classification	Initial measurement or Quarterly measurement	Leak Rate (lb/hr)	Current Date	Current Emission Volume (lbs)	VOC Emissions (lbs)
3/1/2024	12:00	DBCB-FV-3141B	DOR @1D M21 LDAR FV-3141B Leak 504	504	Flanges	Residue Gas	1000	<10k ppm	Initial	0.000013	1/13/2026	0.213018	0.053255
2/26/2024	12:00	DBCB-PV-3141	DOR @1D LDAR M21 PV-3141-48 tag# 1020	1020	Connectors	Residue Gas	700	<10k ppm	Initial	0.000022	1/13/2026	0.362581	0.090645
2/1/2024	12:00	DBCB-FIT-3141B2	DOR @1D LDAR FIT-3141B2 TAG 447	447	Others	Residue Gas	550	<10k ppm	Initial	0.00027	1/13/2026	4.610363	1.152591
3/1/2024	12:00	DBCB-FV-3141B	DOR @1D M21 LDAR FV-3141B Leak 504	504	Flanges	Residue Gas	1000	<10k ppm	Initial	0.000013	1/13/2026	0.213018	0.053255
2/26/2024	12:00	DBCB-PV-3141	DOR @1D LDAR M21 PV-3141-48 tag# 1020	1020	Connectors	Residue Gas	700	<10k ppm	Initial	0.000022	1/13/2026	0.362581	0.090645
2/1/2024	12:00	DBCB-FIT-3141B2	DOR @1D LDAR FIT-3141B2 TAG 447	447	Others	Residue Gas	550	<10k ppm	Initial	0.00027	1/13/2026	4.610363	1.152591
3/1/2024	12:00	DBCB-FV-3141B	DOR @1D M21 LDAR FV-3141B Leak 504	504	Flanges	Residue Gas	1000	<10k ppm	Initial	0.000013	1/13/2026	0.213018	0.053255
2/26/2024	12:00	DBCB-PV-3141	DOR @1D LDAR M21 PV-3141-48 tag# 1020	1020	Connectors	Residue Gas	700	<10k ppm	Initial	0.000022	1/13/2026	0.362581	0.090645
2/1/2024	12:00	DBCB-FIT-3141B2	DOR @1D LDAR FIT-3141B2 TAG 447	447	Others	Residue Gas	550	<10k ppm	Initial	0.00027	1/13/2026	4.610363	1.152591
3/1/2024	12:00	DBCB-FV-3141B	DOR @1D M21 LDAR FV-3141B Leak 504	504	Flanges	Residue Gas	1000	<10k ppm	Quarterly	0.000013	1/13/2026	0	0
2/26/2024	12:00	DBCB-PV-3141	DOR @1D LDAR M21 PV-3141-48 tag# 1020	1020	Connectors	Residue Gas	700	<10k ppm	Quarterly	0.000022	1/13/2026	0	0
2/1/2024	12:00	DBCB-FIT-3141B2	DOR @1D LDAR FIT-3141B2 TAG 447	447	Others	Residue Gas	550	<10k ppm	Quarterly	0.00027	1/13/2026	0	0
3/1/2024	12:00	DBCB-FV-3141B	DOR @1D M21 LDAR FV-3141B Leak 504	504	Flanges	Residue Gas	1000	<10k ppm	Quarterly	0.000013	1/13/2026	0	0
2/26/2024	12:00	DBCB-PV-3141	DOR @1D LDAR M21 PV-3141-48 tag# 1020	1020	Connectors	Residue Gas	700	<10k ppm	Quarterly	0.000022	1/13/2026	0	0
2/1/2024	12:00	DBCB-FIT-3141B2	DOR @1D LDAR FIT-3141B2 TAG 447	447	Others	Residue Gas	550	<10k ppm	Quarterly	0.00027	1/13/2026	0	0

Cryo Train 2 - DOR Leak Tracking

Current Total Emissions (lbs)	6.482

Date	Time	Leaking Component ID	Leaking Component Description	Delay of Repair Leak Tag ID	Leaking Component Type	Service	M21 instrument measurement (ppm)	Leak classification	Initial measurement or Quarterly measurement	Leak Rate (lb/hr)	Current Date	Current Emission Volume (lbs)	VOC Emissions (lbs)
3/1/2024	12:00	DBCB-FV-3141B	DOR @1D M21 LDAR FV-3141B Leak 504	504	Flanges	Residue Gas	1000	<10k ppm	Initial	0.000013	1/13/2026	0.213018	0.053255
2/26/2024	12:00	DBCB-PV-3141	DOR @1D LDAR M21 PV-3141-48 tag# 1020	1020	Connectors	Residue Gas	700	<10k ppm	Initial	0.000022	1/13/2026	0.362581	0.090645
2/1/2024	12:00	DBCB-FIT-3141B2	DOR @1D LDAR FIT-3141B2 TAG 447	447	Others	Residue Gas	550	<10k ppm	Initial	0.00027	1/13/2026	4.610363	1.152591
3/1/2024	12:00	DBCB-FV-3141B	DOR @1D M21 LDAR FV-3141B Leak 504	504	Flanges	Residue Gas	1000	<10k ppm	Initial	0.000013	1/13/2026	0.213018	0.053255
2/26/2024	12:00	DBCB-PV-3141	DOR @1D LDAR M21 PV-3141-48 tag# 1020	1020	Connectors	Residue Gas	700	<10k ppm	Initial	0.000022	1/13/2026	0.362581	0.090645
2/1/2024	12:00	DBCB-FIT-3141B2	DOR @1D LDAR FIT-3141B2 TAG 447	447	Others	Residue Gas	550	<10k ppm	Initial	0.00027	1/13/2026	4.610363	1.152591
3/1/2024	12:00	DBCB-FV-3141B	DOR @1D M21 LDAR FV-3141B Leak 504	504	Flanges	Residue Gas	1000	<10k ppm	Initial	0.000013	1/13/2026	0.213018	0.053255
2/26/2024	12:00	DBCB-PV-3141	DOR @1D LDAR M21 PV-3141-48 tag# 1020	1020	Connectors	Residue Gas	700	<10k ppm	Initial	0.000022	1/13/2026	0.362581	0.090645
2/1/2024	12:00	DBCB-FIT-3141B2	DOR @1D LDAR FIT-3141B2 TAG 447	447	Others	Residue Gas	550	<10k ppm	Initial	0.00027	1/13/2026	4.610363	1.152591
3/1/2024	12:00	DBCB-FV-3141B	DOR @1D M21 LDAR FV-3141B Leak 504	504	Flanges	Residue Gas	1000	<10k ppm	Initial	0.000013	1/13/2026	0.213018	0.053255
2/26/2024	12:00	DBCB-PV-3141	DOR @1D LDAR M21 PV-3141-48 tag# 1020	1020	Connectors	Residue Gas	700	<10k ppm	Initial	0.000022	1/13/2026	0.362581	0.090645
2/1/2024	12:00	DBCB-FIT-3141B2	DOR @1D LDAR FIT-3141B2 TAG 447	447	Others	Residue Gas	550	<10k ppm	Initial	0.00027	1/13/2026	4.610363	1.152591
3/1/2024	12:00	DBCB-FV-3141B	DOR @1D M21 LDAR FV-3141B Leak 504	504	Flanges	Residue Gas	1000	<10k ppm	Initial	0.000013	1/13/2026	0.213018	0.053255
2/26/2024	12:00	DBCB-PV-3141	DOR @1D LDAR M21 PV-3141-48 tag# 1020	1020	Connectors	Residue Gas	700	<10k ppm	Initial	0.000022	1/13/2026	0.362581	0.090645
2/1/2024	12:00	DBCB-FIT-3141B2	DOR @1D LDAR FIT-3141B2 TAG 447	447	Others	Residue Gas	550	<10k ppm	Initial	0.00027	1/13/2026	4.610363	1.152591

Cryo Train 3 - DOR Leak Tracking

Current Total Emissions (lbs)	5.186

Date	Time	Leaking Component ID	Leaking Component Description	Delay of Repair Leak Tag ID	Leaking Component Type	Service	M21 instrument measurement (ppm)	Leak classification	Initial measurement or Quarterly measurement	Leak Rate (lb/hr)	Current Date	Current Emission Volume (lbs)	VOC Emissions (lbs)
3/1/2024	12:00	DBCB-FV-3141B	DOR @1D M21 LDAR FV-3141B Leak 504	504	Flanges	Residue Gas	1000	<10k ppm	Initial	0.000013	1/13/2026	0.213018	0.053255
2/26/2024	12:00	DBCB-PV-3141	DOR @1D LDAR M21 PV-3141-48 tag# 1020	1020	Connectors	Residue Gas	700	<10k ppm	Initial	0.000022	1/13/2026	0.362581	0.090645
2/1/2024	12:00	DBCB-FIT-3141B2	DOR @1D LDAR FIT-3141B2 TAG 447	447	Others	Residue Gas	550	<10k ppm	Initial	0.00027	1/13/2026	4.610363	1.152591
3/1/2024	12:00	DBCB-FV-3141B	DOR @1D M21 LDAR FV-3141B Leak 504	504	Flanges	Residue Gas	1000	<10k ppm	Initial	0.000013	1/13/2026	0.213018	0.053255
2/26/2024	12:00	DBCB-PV-3141	DOR @1D LDAR M21 PV-3141-48 tag# 1020	1020	Connectors	Residue Gas	700	<10k ppm	Initial	0.000022	1/13/2026	0.362581	0.090645
2/1/2024	12:00	DBCB-FIT-3141B2	DOR @1D LDAR FIT-3141B2 TAG 447	447	Others	Residue Gas	550	<10k ppm	Initial	0.00027	1/13/2026	4.610363	1.152591
3/1/2024	12:00	DBCB-FV-3141B	DOR @1D M21 LDAR FV-3141B Leak 504	504	Flanges	Residue Gas	1000	<10k ppm	Initial	0.000013	1/13/2026	0.213018	0.053255
2/26/2024	12:00	DBCB-PV-3141	DOR @1D LDAR M21 PV-3141-48 tag# 1020	1020	Connectors	Residue Gas	700	<10k ppm	Initial	0.000022	1/13/2026	0.362581	0.090645
2/1/2024	12:00	DBCB-FIT-3141B2	DOR @1D LDAR FIT-3141B2 TAG 447	447	Others	Residue Gas	550	<10k ppm	Initial	0.00027	1/13/2026	4.610363	1.152591
3/1/2024	12:00	DBCB-FV-3141B	DOR @1D M21 LDAR FV-3141B Leak 504	504	Flanges	Residue Gas	1000	<10k ppm	Initial	0.000013	1/13/2026	0.213018	0.053255
2/26/2024	12:00	DBCB-PV-3141	DOR @1D LDAR M21 PV-3141-48 tag# 1020	1020	Connectors	Residue Gas	700	<10k ppm	Initial	0.000022	1/13/2026	0.362581	0.090645
2/1/2024	12:00	DBCB-FIT-3141B2	DOR @1D LDAR FIT-3141B2 TAG 447	447	Others	Residue Gas	550	<10k ppm	Initial	0.00027	1/13/2026	4.610363	1.152591
3/1/2024	12:00	DBCB-FV-3141B	DOR @1D M21 LDAR FV-3141B Leak 504	504	Flanges	Residue Gas	1000	<10k ppm	Quarterly	0.000013	1/13/2026	0	0
2/26/2024	12:00	DBCB-PV-3141	DOR @1D LDAR M21 PV-3141-48 tag# 1020	1020	Connectors	Residue Gas	700	<10k ppm	Quarterly	0.000022	1/13/2026	0	0
2/1/2024	12:00	DBCB-FIT-3141B2	DOR @1D LDAR FIT-3141B2 TAG 447	447	Others	Residue Gas	550	<10k ppm	Quarterly	0.00027	1/13/2026	0	0

Cryo Train 4 - DOR Leak Tracking

Current Total Emissions (lbs)	1.296

Date	Time	Leaking Component ID	Leaking Component Description	Delay of Repair Leak Tag ID	Leaking Component Type	Service	M21 instrument measurement (ppm)	Leak classification	Initial measurement or Quarterly measurement	Leak Rate (lb/hr)	Current Date	Current Emission Volume (lbs)	VOC Emissions (lbs)
3/1/2024	12:00	DBCB-FV-3141B	DOR @1D M21 LDAR FV-3141B Leak 504	504	Flanges	Residue Gas	1000	<10k ppm	Initial	0.000013	1/13/2026	0.213018	0.053255
2/26/2024	12:00	DBCB-PV-3141	DOR @1D LDAR M21 PV-3141-48 tag# 1020	1020	Connectors	Residue Gas	700	<10k ppm	Initial	0.000022	1/13/2026	0.362581	0.090645
2/1/2024	12:00	DBCB-FIT-3141B2	DOR @1D LDAR FIT-3141B2 TAG 447	447	Others	Residue Gas	550	<10k ppm	Initial	0.00027	1/13/2026	4.610363	1.152591

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Attachment 5: Cryo Blowdown Calculations

XTO Energy, Inc.
Cowboy CDP
SUMMARY

Cryo Blowdown Emissions Summary Table

Stream Source[a]	NOx	CO	Total VOC (Includes Total HAPs)	SO_2	$PM_{10\ \&\ 2.5}$	Total HAPs
	ton/event	ton/event	ton/event	ton/event	ton/event	ton/event
Cryo SSM Gas (FL1-FL3CRYO-SSM)	0.92	1.83	0.57	0.016	0.044	0.020
Cryo VENT SSM Gas	--	--	0.022	--	--	7.73E-04
Total Emissions	**0.92**	**1.83**	**0.59**	**0.016**	**0.044**	**0.021**

Footnotes:

[a] SSM gas can be routed to one or any combination of the three flares. For emissions tracking purposes in accordance with the permit, XTO Energy is requesting a combined emisison limit for flaring.

XTO Energy, Inc.
Cowboy CDP
DUAL TIP FLARES - CRYO SSM EVENT EMISSIONS (FL1 - FL3)

Annual Emission CRYO-SSM Rates and Composition to Flare[a,b]					
Component	CRYO Blowdown SSM Gas		Destruction Efficiency	Exhaust Stream (controlled)	
	(lb/event)	(ton/event)	(%)	(lb/event)	(ton/event)
Water	0.00E+00	0.00E+00	0%	0.00E+00	0.00E+00
Hydrogen Sulfide	0.00E+00	0.00E+00	98%	0.00E+00	0.00E+00
Nitrogen	20,165.96	10.08	0%	20165.96	10.08
Carbon Dioxide	1,470.50	0.74	0%	1470.50	0.74
Methane	491,089.33	245.54	98%	9821.79	4.91
Ethane	78,318.80	39.16	98%	1566.38	0.78
Propane	35,862.11	17.93	98%	717.24	0.36
Iso-butane	5,318.42	2.66	98%	106.37	0.053
N-butane	11,070.87	5.54	98%	221.42	0.11
Iso-pentane	0.00E+00	0.00E+00	98%	0.00E+00	0.00E+00
N-pentane	2,519.93	1.26	98%	50.40	0.025
Cyclopentanes	0.00E+00	0.00E+00	98%	0.00E+00	0.00E+00
Other Hexanes	0.00E+00	0.00E+00	98%	0.00E+00	0.00E+00
n-Hexane	1,982.26	0.99	98%	39.65	0.020
Methylcyclopentane	0.00E+00	0.00E+00	98%	0.00E+00	0.00E+00
Benzene	0.00E+00	0.00E+00	98%	0.00E+00	0.00E+00
Cyclohexane	0.00E+00	0.00E+00	98%	0.00E+00	0.00E+00
2,2,4 Trimethylpentane	0.00E+00	0.00E+00	98%	0.00E+00	0.00E+00
Other Heptanes	0.00E+00	0.00E+00	98%	0.00E+00	0.00E+00
Methylcyclohexane	0.00E+00	0.00E+00	98%	0.00E+00	0.00E+00
n-Heptane	0.00E+00	0.00E+00	98%	0.00E+00	0.00E+00
Toluene	0.00E+00	0.00E+00	98%	0.00E+00	0.00E+00
Octanes	0.00E+00	0.00E+00	98%	0.00E+00	0.00E+00
Ethylbenzene	0.00E+00	0.00E+00	98%	0.00E+00	0.00E+00
M&P-Xylene	0.00E+00	0.00E+00	98%	0.00E+00	0.00E+00
Nonanes	0.00E+00	0.00E+00	98%	0.00E+00	0.00E+00
Decanes	0.00E+00	0.00E+00	98%	0.00E+00	0.00E+00
Undecanes Plus	0.00E+00	0.00E+00	98%	0.00E+00	0.00E+00
Total	647,798.19	323.90	--	34159.69	17.08
Total VOC	56,753.60	28.38	--	1135.07	0.57
Total HAP	1,982.26	0.99	--	39.65	0.020
Net Heating Value (Btu/scf)	1,148.00				
Molecular Weight (lb/lbmol)	21.27				
SO2 Emissions	0.016				
Volumetric Flow (scf/event)	11,551,944				
Heat Release (MMBtu/event)	13,261.63				

Criteria Pollutant Emissions from Flare [b]			
Component	Emission Rate	Emission Factor	Emission Factor Units
	ton/event		
NO_X	0.92	0.138	lb/MMBtu
CO	1.83	0.2755	lb/MMBtu
SO_2	0.016	25	PPMW Total S
PM_{10}	0.044	7.60	lb/MMscf
$PM_{2.5}$	0.044	7.60	lb/MMscf
H_2S	0.00E+00	--	--

Flare DRE	98.00	%

Footnotes:

[a] Stream properties are taken from Cryo Blowdown gas analysis.

[b] Flare CO and NOx emission factors from TCEQ Air Permit Techincal Guidance for Chemical Sources. PM and PM2.5 emission factors from AP-42, Table 1.4-1 and 1.4-2, July 1998. SO2 emissions assumes 100% of total sulfur in the gas stream is converted to SO2.

XTO Energy, Inc.
Cowboy CDP
CRYO VENT SSM EVENT EMISSIONS

Annual Emission CRYO-SSM Rates [a,b]		
Component	CRYO Blowdown SSM Gas	
	(lb/event)	(ton/event)
Water	0.00E+00	0.00E+00
Hydrogen Sulfide	0.00E+00	0.00E+00
Nitrogen	15.73	7.87E-03
Carbon Dioxide	1.15	5.74E-04
Methane	383.17	0.19
Ethane	61.11	0.031
Propane	27.98	0.014
Iso-butane	4.15	2.07E-03
N-butane	8.64	4.32E-03
Iso-pentane	0.00E+00	0.00E+00
N-pentane	1.97	9.83E-04
Cyclopentanes	0.00E+00	0.00E+00
Other Hexanes	0.00E+00	0.00E+00
n-Hexane	1.55	7.73E-04
Methylcyclopentane	0.00E+00	0.00E+00
Benzene	0.00E+00	0.00E+00
Cyclohexane	0.00E+00	0.00E+00
2,2,4 Trimethylpentane	0.00E+00	0.00E+00
Other Heptanes	0.00E+00	0.00E+00
Methylcyclohexane	0.00E+00	0.00E+00
n-Heptane	0.00E+00	0.00E+00
Toluene	0.00E+00	0.00E+00
Octanes	0.00E+00	0.00E+00
Ethylbenzene	0.00E+00	0.00E+00
M&P-Xylene	0.00E+00	0.00E+00
Nonanes	0.00E+00	0.00E+00
Decanes	0.00E+00	0.00E+00
Undecanes Plus	0.00E+00	0.00E+00
Total	**505.44**	**0.25**
Total VOC	**44.28**	**0.022**
Total HAP	**1.55**	**7.73E-04**
Net Heating Value (Btu/scf)	1,148.00	
Molecular Weight (lb/lbmol)	21.27	
Volumetric Flow (scf/event)	9,013	
Heat Release (MMBtu/event)	10.35	

Criteria Pollutant Emissions	
Component	Emission Rate
	ton/event
VOC	0.022
HAP	7.73E-04
H_2S	0.00E+00

Footnotes:

[a] Stream properties are taken from Cryo Blowdown gas analysis.

XTO Energy Inc.
3104 E Greene St
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(713) 389-9924

January 19, 2026

RECEIVED
JAN 26 2026
Air Quality Bureau

New Mexico Environment Department
Air Quality Bureau
Permit Program Manager
525 Camino De Los Marquez, Suite 1
Santa Fe, NM 87505

Subject: Application for an Alternative Equipment Leak Monitoring Plan
XTO Energy Inc. – Cowboy Central Delivery Point (CDP)
NSR Permit No. 7877-M3

To whom it may concern,

Pursuant to the requirements of 20.2.50.116(D) NMAC, XTO Energy, Inc. (XTO) hereby submits an application for an Alternative Equipment Leak Monitoring Plan (AELMP) requesting approval to repair leaks on cryogenic trains designed as "repair delayed" under Subsection 20.2.50.116(E)(4) NMAC until the next scheduled cryogenic train shutdown. This application package includes all required documentation and utilizes the most current application form available on the Bureau's website.

Per subsection 20.2.50.116(E)(2) and (E)(4), leaks identified with the monitoring under the subpart shall be repaired as soon as practicable but no later than 30 days from discovery. If the leak cannot be repaired within 30 days of discovery without a process unit shutdown, the leak may be designated as "repair delayed" and the leak must be repaired before the end of the next scheduled process unit shutdown or within 2 years, whichever is earlier.

XTO has complied with the monitoring requirements of 20.2.50.116 NMAC and has identified a number of fugitive leaks designated as "repair delayed" on the cryogenic trains at Cowboy CDP. In order to conduct appropriate repairs on each leak designated as "repair delayed" the associated cryogenic train must be fully shutdown.

To meet the two-year repair deadline under 20.2.50.116(E)(4) NMAC, XTO would be required to shutdown multiple cryogenic trains outside of their scheduled maintenance windows. XTO proposes to conduct routine, scheduled shutdowns for maintenance on each cryogenic train in response to a VOC limit, ensuring that emissions do not

XTO Energy Inc.
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exceed those associated with a standard cryogenic train shutdown, in lieu of the requirement to repair 'repair-delayed' leaks within two years. Shutting down the cryogenic system outside of its scheduled shutdown date would necessitate flaring blowdown gas and venting residual gas, resulting in significantly higher emissions than if the leak repair(s) were deferred until the next scheduled shutdown. Therefore, XTO proposes to repair such leaks during the next scheduled cryogenic shutdown event. To support this request, XTO has prepared an emission comparison between a full cryogenic train shutdown and the extended emissions from fugitive leaks beyond the two-year regulatory repair timeline. The analysis demonstrates a net reduction in overall emissions of criteria pollutants (NOx, CO, SO2, PM10, and PM2.5), VOCs, and HAPs resulting from the proposed delayed repair schedule.

If you have any questions regarding this AELMP application, please contact Jeff Myhra, New Mexico Air Emissions Supervisor at 713-389-9924 or Jeffrey.T.Myhra@exxonmobil.com

Sincerely,

Jeffrey T. Myhra
New Mexico Air Emissions Supervisor
XTO Energy, Inc.

ExxonMobil

XTO – Alternative Monitoring Plan (Cowboy)

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Contents

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Purpose

XTO Energy Inc. (XTO) owns and operates the Cowboy Central Delivery Point (Cowboy CDP) which is authorized under NSR Permit No. 7877-M3. Cowboy CDP is subject to the equipment leaks and fugitive emission requirements outlined in 20.2.50.116 NMAC. Per Subsection E.(2) and (4), leaks identified with the monitoring under the subpart shall be repaired as soon as practicable but no later than 30 days from discovery. If the leak cannot be repaired within 30 days of discovery without a process unit shutdown, the leak may be designated as "repair delayed" and the leak must be repaired before the end of the next scheduled process unit shutdown or within 2 years, whichever is earlier.

XTO, under this approved alternative leak monitoring plan, will conduct routine scheduled shutdowns for maintenance on each cryogenic train in response to a VOC limit not to exceed emissions from a routine cryogenic unit shutdown.

XTO will conduct quarterly Method 21 monitoring on leaks designated as "repair delayed" as specified in this alternative leak monitoring plan. XTO will track emissions from leaks designated as "repair delayed" as prescribed in this plan. XTO will continue to conduct regulatory required Method 21 and OGI survey inspections.

At any point in time, XTO may adhere to the default requirements of NMAC 20.2.50.116 in lieu of this monitoring plan.

Alternative LDAR Monitoring Plan Requirements and Execution

Monitoring Execution

For leaks identified on Cryogenic Trains designated as "repair delayed", XTO will conduct quarterly Method 21 monitoring per *Appendix A-7 to Part 60, Title 40* within 90 days of identifying the leak. A leak is defined when the instrument records a measurement of hydrocarbons, and the measurement is not associated with normal equipment operation, such as pneumatic device actuation and crank case ventilation in accordance with *20.2.50.116 NMAC*. Monitoring periods for leaks prescribed under this plan will be conducted once per calendar quarter no less than 30 days apart. XTO will record the Method 21 monitoring data in accordance with the leak tracking template in Attachment 2.

Leak Tracking

Emissions will be estimated and tracked based on Method 21 monitoring results described above and the leak rate established in Table 2-8 of the *EPA Protocol for Equipment Leak Emission Estimates EPA-453/R-95-017, November 1995* found in Attachment 3. Each leak designated as "repair delayed" will have the associated leak rate identified based on the Method 21 reading for that quarter and the component type. Examples of leak information collected and emissions estimations can be found in Attachment 4. Leaks are tracked on a Cryogenic train basis to estimate emissions for each individual Cryogenic train.

Shutdown process

If the estimated fugitive leak emissions associated with a Cryo Unit, resulting from leaks designated as "repair delayed", approach the calculated VOC emissions associated with a Cryo Train shutdown then Operations and Maintenance will schedule a planned Cryo Unit shutdown to commence repairs. A planned shutdown does not include periods of unplanned or unexpected cryo unit or plantwide outages or temporary cryo or plant outages due to emergency maintenance activities.

Upon reaching nominal operating conditions following a cryo unit shutdown, all leaks designated as "repair delayed" will be resurveyed in accordance to all applicable regulatory requirements.

Attachments

1. Application Form for an Alternative Equipment Leak Monitoring Plan
2. DOR Leak Tracking Template
3. EPA Protocol for Equipment Leak Emission Estimates
4. Example of DOR Leak Tracking Template (Cryo Trains 1-4)
5. Cryo Blowdown Calculations

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Attachment 1: Application Form for an Alternative Equipment Leak Monitoring Plan