

SLR International Corporation

1612 Specht Point Road, Suite 119, Fort Collins, Colorado, 80525



September 10, 2025

Rhonda Romero
Program Manager- Minor Source Permitting Section
New Mexico Environmental Department
525 Camino de los Marquez, Suite 1A
Santa Fe, NM 87505-1816

SLR Project No.: 118.021455.00001

**RE: Application for a Minor Source Construction Permit
Saddle Butte Energy Farmington, LLC
Westside Station**

Dear Ms. Romero,

On behalf of Saddle Butte Energy Farmington LLC (SBE), SLR Consulting is submitting this application to the New Mexico Environmental Department – Air Quality Bureau (Department) for the construction of a power plant (Westside Station or facility) to be located in San Juan County, New Mexico.

The facility will consist of six (6) Jenbacher JGC 620 4-Stroke Lean Burn engines each rated 4,183 brake-horsepower (bhp) and ten (10) Jenbacher JGC 624 4-Stroke Lean Burn engines each rated 6,161 bhp. The facility will be considered a synthetic minor source for Prevention of Significant Deterioration (PSD) rules. In addition, the facility will be a major source of Hazardous Air Pollutants and for Title V rules .

The format of this application is consistent with the Department's Universal Air Quality Permit Application forms. This application package is complete and in the most current application form. Enclosed is a hard copy of the application and the original certification. Please feel free to contact me at (970) 999-3968 or by email jvanhorne@slrconsulting.com if you have any questions regarding this application. Alternatively, you may contact Trent Miller at (303) 619-6991 or by email at tmiller@sbpipeline.com .

Regards,

SLR International Corporation

A handwritten signature in black ink that reads "James Van Horne".

James Van Horne, P.E.
Senior Principal Engineer

Cc: Trent Miller – SBE
Cole Dougherty - SBE



Minor Source Construction Permit Application

Westside Station

Saddle Butte Energy Farmington, LLC

1900 16th Street, Suite 200, Denver, CO 80202

Prepared by:

SLR International Corporation

1612 Specht Point Road, Suite 119, Fort Collins, Colorado, 80525

SLR Project No.: 118.021455.00001

September 10, 2025

Revision: 0

Mail Application To: New Mexico Environment Department Air Quality Bureau Permits Section 525 Camino de los Marquez, Suite 1A Santa Fe, New Mexico, 87505 Phone: (505) 476-4300 Fax: (505) 476-4375 www.env.nm.gov/aqb		For Department use only:
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Universal Air Quality Permit Application

Use this application for NOI, NSR, or Title V sources.

Use this application for: the initial application, modifications, technical revisions, and renewals. For technical revisions, complete Sections, 1-A, 1-B, 2-E, 3, 9 and any other sections that are relevant to the requested action; coordination with the Air Quality Bureau permit staff prior to submittal is encouraged to clarify submittal requirements and to determine if more or less than these sections of the application are needed. Use this application for streamline permits as well.

This application is submitted as (check all that apply): ☐ Request for a No Permit Required Determination (no fee)
☐ **Updating** an application currently under NMED review. Include this page and all pages that are being updated (no fee required).
 Construction Status: ☒ Not Constructed ☐ Existing Permitted (or NOI) Facility ☐ Existing Non-permitted (or NOI) Facility
 Minor Source: ☐ a NOI 20.2.73 NMAC ☒ 20.2.72 NMAC application or revision ☐ 20.2.72.300 NMAC Streamline application
 Title V Source: ☐ Title V (new) ☐ Title V renewal ☐ TV minor mod. ☐ TV significant mod. TV Acid Rain: ☐ New ☐ Renewal
 PSD Major Source: ☐ PSD major source (new) ☐ minor modification to a PSD source ☐ a PSD major modification

Acknowledgements:

☒ I acknowledge that a pre-application meeting is available to me upon request. ☒ Title V Operating, Title IV Acid Rain, and NPR applications have no fees.
☒ \$500 NSR application Filing Fee enclosed **OR** ☐ The full permit fee associated with 10 fee points (required w/ streamline applications).
☒ Check No.: 4093 in the amount of \$500
☒ I acknowledge the required submittal format for the hard copy application is printed double sided 'head-to-toe', 2-hole punched (except the Sect. 2 landscape tables is printed 'head-to-head'), numbered tab separators. Incl. a copy of the check on a separate page.
☒ I acknowledge there is an annual fee for permits in addition to the permit review fee: www.env.nm.gov/air-quality/permit-fees-2/.
☐ This facility qualifies for the small business fee reduction per 20.2.75.11.C. NMAC. The full \$500.00 filing fee is included with this application and I understand the fee reduction will be calculated in the balance due invoice. The Small Business Certification Form has been previously submitted or is included with this application. (Small Business Environmental Assistance Program Information: www.env.nm.gov/air-quality/small-biz-eap-2/.)

Citation: Please provide the **low level citation** under which this application is being submitted: **20.2.72.200.A NMAC** (e.g. application for a new minor source would be 20.2.72.200.A NMAC, one example for a Technical Permit Revision is 20.2.72.219.B.1.b NMAC, a Title V acid rain application would be: 20.2.70.200.C NMAC)

Section 1 – Facility Information

Section 1-A: Company Information

		AI # if known (see 1 st 3 to 5 #s of permit IDEA ID No.): TBD	Updating Permit/NOI #:
1	Facility Name: Westside Station	Plant primary SIC Code (4 digits): 4911	
		Plant NAIC code (6 digits): 221112	
a	Facility Street Address (If no facility street address, provide directions from a prominent landmark): 0.75 miles Northwest of the intersection of Rd 6480 and Rd 6200, San Juan County		
2	Plant Operator Company Name: Saddle Butte Energy Farmington, LLC	Phone/Fax: 303.295.8918	
a	Plant Operator Address: 1900 16 th Street, Suite 200, Denver, CO 80202		

b	Plant Operator's New Mexico Corporate ID or Tax ID: 0008024821	
3	Plant Owner(s) name(s): Saddle Butte Energy Farmington, LLC	Phone/Fax: 303.295.8918
a	Plant Owner(s) Mailing Address(s): 1900 16th Street, Suite 200, Denver, CO 80202	
4	Bill To (Company): Saddle Butte Energy Farmington, LLC	Phone/Fax: 303.295.8918
a	Mailing Address: 1900 16th Street, Suite 200, Denver, CO 80202	E-mail: ap@sbpipeline.com
5	☐ Preparer: ☒ Consultant: James Van Horne	Phone/Fax: (970) 494-0805
a	Mailing Address: 1612 Specht Point Rd, Suite 119, Fort Collins, CO 80525	E-mail: jvanhorne@slrconsulting.com
6	Plant Operator Contact: Christian Stoddard	Phone/Fax: 970.828.2084
a	Address: 858 Main Ave, Suite 301, Durango, CO 81301	E-mail: cstoddard@sbpipeline.com
7	Air Permit Contact: Trent Miller	Title: Environmental Manager
a	E-mail: tmiller@sbpipeline.com	Phone/Fax: (303) 446-7532/(970) 282-2138
b	Mailing Address: 1900 16 th Street, Suite 200, Denver, CO 80202	
c	The designated Air permit Contact will receive all official correspondence (i.e. letters, permits) from the Air Quality Bureau.	

Section 1-B: Current Facility Status

1.a	Has this facility already been constructed? ☐ Yes ☒ No	1.b If yes to question 1.a, is it currently operating in New Mexico? ☐ Yes ☐ No
2	If yes to question 1.a, was the existing facility subject to a Notice of Intent (NOI) (20.2.73 NMAC) before submittal of this application? ☐ Yes ☐ No	If yes to question 1.a, was the existing facility subject to a construction permit (20.2.72 NMAC) before submittal of this application? ☐ Yes ☐ No
3	Is the facility currently shut down? ☐ Yes ☒ No	If yes, give month and year of shut down (MM/YY):
4	Was this facility constructed before 8/31/1972 and continuously operated since 1972? ☐ Yes ☒ No	
5	If Yes to question 3, has this facility been modified (see 20.2.72.7.P NMAC) or the capacity increased since 8/31/1972? ☐ Yes ☐ No ☐ N/A	
6	Does this facility have a Title V operating permit (20.2.70 NMAC)? ☐ Yes ☒ No	If yes, the permit No. is: P-
7	Has this facility been issued a No Permit Required (NPR)? ☐ Yes ☒ No	If yes, the NPR No. is:
8	Has this facility been issued a Notice of Intent (NOI)? ☐ Yes ☒ No	If yes, the NOI No. is:
9	Does this facility have a construction permit (20.2.72/20.2.74 NMAC)? ☐ Yes ☒ No	If yes, the permit No. is:
10	Is this facility registered under a General permit (GCP-1, GCP-2, etc.)? ☐ Yes ☒ No	If yes, the register No. is:

Section 1-C: Facility Input Capacity & Production Rate

1	What is the facility's maximum input capacity, specify units (reference here and list capacities in Section 20, if more room is required)			
a	Current	Hourly: N/A	Daily: N/A	Annually: N/A
b	Proposed	Hourly: 492 Mscf/hr	Daily: 11.8 MMscf/day	Annually: 4,313 MMscf/yr
2	What is the facility's maximum production rate, specify units (reference here and list capacities in Section 20, if more room is required)			
a	Current	Hourly: N/A	Daily: N/A	Annually: N/A

b	Proposed	Hourly: 63 MWh	Daily: 1,512 MWh	Annually: 551,880 MWh
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Section 1-D: Facility Location Information

1	Section: 4	Range: 14W	Township: 29N	County: San Juan	Elevation (ft): 5340
2	UTM Zone: ☒ 12 or ☐ 13			Datum: ☐ NAD 27 ☐ NAD 83 ☒ WGS 84	
a	UTM E (in meters, to nearest 10 meters): 738995			UTM N (in meters, to nearest 10 meters): 4071737	
b	AND Latitude (deg., min., sec.): 36° 45' 40.7052" N			Longitude (deg., min., sec.): 108° 19' 21.2088" W	
3	Name and zip code of nearest New Mexico town: Kirtland, NM 87417				
4	From Kirtland, NM drive north on Rd 650. Turn right on Rd 6480. Drive 2.2 miles and turn left on the facility access road. Drive 0.25 miles on the facility access road to the facility entrance.				
5	The facility is 2.43 miles NE of Kirtland, NM.				
6	Status of land at facility (check one): ☒ Private ☐ Indian/Pueblo ☐ Federal BLM ☐ Federal Forest Service ☐ Other (specify)				
7	List all municipalities, Indian tribes, and counties within a ten (10) mile radius (20.2.72.203.B.2 NMAC) of the property on which the facility is proposed to be constructed or operated: Navajo Nation, Kirtland, San Juan County, Ute Mountain Ute Tribe, Farmington				
8	20.2.72 NMAC applications only : Will the property on which the facility is proposed to be constructed or operated be closer than 50 km (31 miles) to other states, Bernalillo County, or a Class I area (see www.env.nm.gov/air-quality/modeling-publications/)? ☒ Yes ☐ No (20.2.72.206.A.7 NMAC) If yes, list all with corresponding distances in kilometers: Mesa Verde National Park (44 km), State of Colorado (26 km)				
9	Name nearest Class I area: Mesa Verde National Park				
10	Shortest distance (in km) from facility boundary to the boundary of the nearest Class I area (to the nearest 10 meters): 44 km				
11	Distance (meters) from the perimeter of the Area of Operations (AO is defined as the plant site inclusive of all disturbed lands, including mining overburden removal areas) to nearest residence, school or occupied structure: 600 meters				
12	Method(s) used to delineate the Restricted Area: Fencing "Restricted Area" is an area to which public entry is effectively precluded. Effective barriers include continuous fencing, continuous walls, or other continuous barriers approved by the Department, such as rugged physical terrain with steep grade that would require special equipment to traverse. If a large property is completely enclosed by fencing, a restricted area within the property may be identified with signage only. Public roads cannot be part of a Restricted Area.				
13	Does the owner/operator intend to operate this source as a portable stationary source as defined in 20.2.72.7.X NMAC? ☐ Yes ☒ No A portable stationary source is not a mobile source, such as an automobile, but a source that can be installed permanently at one location or that can be re-installed at various locations, such as a hot mix asphalt plant that is moved to different job sites.				
14	Will this facility operate in conjunction with other air regulated parties on the same property? ☒ No ☐ Yes If yes, what is the name and permit number (if known) of the other facility?				

Section 1-E: Proposed Operating Schedule (The 1-E.1 & 1-E.2 operating schedules may become conditions in the permit.)

1	Facility maximum operating ($\frac{\text{hours}}{\text{day}}$): 24	($\frac{\text{days}}{\text{week}}$): 7	($\frac{\text{weeks}}{\text{year}}$): 52	($\frac{\text{hours}}{\text{year}}$): 8,760
2	Facility's maximum daily operating schedule (if less than 24 $\frac{\text{hours}}{\text{day}}$)? Start: N/A		☐ AM ☐ PM	End: N/A ☐ AM ☐ PM
3	Month and year of anticipated start of construction: April, 2026			
4	Month and year of anticipated construction completion: July, 2026			
5	Month and year of anticipated startup of new or modified facility: August, 2026			
6	Will this facility operate at this site for more than one year? ☒ Yes ☐ No			

Section 1-F: Other Facility Information

1	Are there any current Notice of Violations (NOV), compliance orders, or any other compliance or enforcement issues related to this facility? ☐ Yes ☒ No If yes, specify:		
a	If yes, NOV date or description of issue:	NOV Tracking No:	
b	Is this application in response to any issue listed in 1-F, 1 or 1a above? ☐ Yes ☒ No If Yes, provide the 1c & 1d info below:		
c	Document Title:	Date:	Requirement # (or page # and paragraph #):
d	Provide the required text to be inserted in this permit:		
2	Is air quality dispersion modeling or modeling waiver being submitted with this application? ☒ Yes ☐ No		
3	Does this facility require an "Air Toxics" permit under 20.2.72.400 NMAC & 20.2.72.502, Tables A and/or B? ☒ Yes ☐ No		
4	Will this facility be a source of federal Hazardous Air Pollutants (HAP)? ☒ Yes ☐ No		
a	If Yes, what type of source? ☒ Major (☒ ≥10 tpy of any single HAP OR ☐ ≥25 tpy of any combination of HAPS) OR ☐ Minor (☐ <10 tpy of any single HAP AND ☐ <25 tpy of any combination of HAPS)		
5	Is any unit exempt under 20.2.72.202.B.3 NMAC? ☒ Yes ☐ No		
a	If yes, include the name of company providing commercial electric power to the facility: _____ Commercial power is purchased from a commercial utility company, which specifically does not include power generated on site for the sole purpose of the user.		

Section 1-G: Streamline Application (This section applies to 20.2.72.300 NMAC Streamline applications only)

1	☐ I have filled out Section 18, "Addendum for Streamline Applications." ☒ N/A (This is not a Streamline application.)
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Section 1-H: Current Title V Information - Required for all applications from TV Sources

(Title V-source required information for all applications submitted pursuant to 20.2.72 NMAC (Minor Construction Permits), or 20.2.74/20.2.79 NMAC (Major PSD/NNSR applications), and/or 20.2.70 NMAC (Title V))

1	Responsible Official (R.O.) David Wait (20.2.70.300.D.2 NMAC):		Phone: 970.828.2075
a	R.O. Title: Chief Operating Officer	R.O. e-mail: dwait@sbpipeline.com	
b	R. O. Address: 858 Main Ave, Suite 301, Durango, CO 81301		
2	Alternate Responsible Official Cole Dougherty (20.2.70.300.D.2 NMAC):		Phone: 303.446.7526
a	A. R.O. Title: Vice President, Engineering	A. R.O. e-mail: CDougherty@sbpipeline.com	
b	A. R. O. Address: 1900 16th Street, Suite 200, Denver, CO 80202		
3	Company's Corporate or Partnership Relationship to any other Air Quality Permittee (List the names of any companies that have operating (20.2.70 NMAC) permits and with whom the applicant for this permit has a corporate or partnership relationship): N/A		
4	Name of Parent Company ("Parent Company" means the primary name of the organization that owns the company to be permitted wholly or in part.): Saddle Butte Energy, LLC		
a	Address of Parent Company: 1900 16 th St, Suite 200, Denver, CO 80202		
5	Names of Subsidiary Companies ("Subsidiary Companies" means organizations, branches, divisions or subsidiaries, which are owned, wholly or in part, by the company to be permitted.): Saddle Butte Energy Farmington, LLC		
6	Telephone numbers & names of the owners' agents and site contacts familiar with plant operations: See above contact for Christian Stoddard		

7	Affected Programs to include Other States, local air pollution control programs (i.e. Bernalillo) and Indian tribes: Will the property on which the facility is proposed to be constructed or operated be closer than 80 km (50 miles) from other states, local pollution control programs, and Indian tribes and pueblos (20.2.70.402.A.2 and 20.2.70.7.B)? If yes, state which ones and provide the distances in kilometers: Navajo Nation (4 km), Ute Mountain Ute Tribe (10 km), Southern Ute Indian Tribe (27 km), State of Colorado (26 km)
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Section 1-I – Submittal Requirements

Each 20.2.73 NMAC (**NOI**), a 20.2.70 NMAC (**Title V**), a 20.2.72 NMAC (**NSR** minor source), or 20.2.74 NMAC (**PSD**) application package shall consist of the following:

Hard Copy Submittal Requirements:

- 1) One hard copy **original signed and notarized application package printed double sided 'head-to-toe' 2-hole punched** as we bind the document on top, not on the side; except Section 2 (landscape tables), which should be **head-to-head**. Please use **numbered tab separators** in the hard copy submittal(s) as this facilitates the review process. For NOI submittals only, hard copies of UA1, Tables 2A, 2D & 2F, Section 3 and the signed Certification Page are required. **Please include a copy of the check on a separate page.**
- 2) If the application is for a minor NSR, PSD, NNSR, or Title V application, include one working hard **copy** for Department use. This **copy** should be printed in book form, 3-hole punched, and **must be double sided**. Note that this is in addition to the head-to-toe 2-hole punched copy required in 1) above. Minor NSR Technical Permit revisions (20.2.72.219.B NMAC) only need to fill out Sections 1-A, 1-B, 3, and should fill out those portions of other Section(s) relevant to the technical permit revision. TV Minor Modifications need only fill out Sections 1-A, 1-B, 1-H, 3, and those portions of other Section(s) relevant to the minor modification. NMED may require additional portions of the application to be submitted, as needed.
- 3) The entire NOI or Permit application package, including the full modeling study, should be submitted electronically. Electronic files for applications for NOIs, any type of General Construction Permit (GCP), or technical revisions to NSRs must be submitted with compact disk (CD) or digital versatile disc (DVD). For these permit application submittals, **two CD** copies are required (in sleeves, not crystal cases, please), with additional CD copies as specified below. NOI applications require only a **single CD** submittal. Electronic files for other New Source Review (construction) permits/permit modifications or Title V permits/permit modifications can be submitted on CD/DVD or sent through AQB's secure file transfer service.

Electronic files sent by (check one):

☐ CD/DVD attached to paper application

☒ secure electronic transfer. Air Permit Contact Name: James Van Horne, Email: jvanhorne@slrconsulting.com

Phone number: (970) 999-3968.

a. If the file transfer service is chosen by the applicant, after receipt of the application, the Bureau will email the applicant with instructions for submitting the electronic files through a secure file transfer service. Submission of the electronic files through the file transfer service needs to be completed within 3 business days after the invitation is received, so the applicant should ensure that the files are ready when sending the hard copy of the application. The applicant will not need a password to complete the transfer. **Do not use the file transfer service for NOIs, any type of GCP, or technical revisions to NSR permits.**

- 4) Optionally, the applicant may submit the files with the application on compact disk (CD) or digital versatile disc (DVD) following the instructions above and the instructions in 5 for applications subject to PSD review.
- 5) If **air dispersion modeling** is required by the application type, include the **NMED Modeling Waiver** and/or electronic air dispersion modeling report, input, and output files. The dispersion modeling **summary report only** should be submitted as hard copy(ies) unless otherwise indicated by the Bureau.
- 6) If the applicant submits the electronic files on CD and the application is subject to PSD review under 20.2.74 NMAC (PSD) or NNSR under 20.2.79 NMC include,
 - a. one additional CD copy for US EPA,
 - b. one additional CD copy for each federal land manager affected (NPS, USFS, FWS, USDI) and,
 - c. one additional CD copy for each affected regulatory agency other than the Air Quality Bureau.

If the application is submitted electronically through the secure file transfer service, these extra CDs do not need to be submitted.

Electronic Submittal Requirements [in addition to the required hard copy(ies)]:

- 1) All required electronic documents shall be submitted as 2 separate CDs or submitted through the AQB secure file transfer service. Submit a single PDF document of the entire application as submitted and the individual documents comprising the application.
- 2) The documents should also be submitted in Microsoft Office compatible file format (Word, Excel, etc.) allowing us to access the text and formulas in the documents (copy & paste). Any documents that cannot be submitted in a Microsoft Office compatible format shall be saved as a PDF file from within the electronic document that created the file. If you are unable to provide Microsoft office compatible electronic files or internally generated PDF files of files (items that were not created electronically: i.e. brochures, maps, graphics, etc.), submit these items in hard copy format. We must be able to review the formulas and inputs that calculated the emissions.
- 3) It is preferred that this application form be submitted as 4 electronic files (3 MSWord docs: Universal Application section 1 [UA1], Universal Application section 3-19 [UA3], and Universal Application 4, the modeling report [UA4]) and 1 Excel file of the tables (Universal Application section 2 [UA2]). Please include as many of the 3-19 Sections as practical in a single MS Word electronic document. Create separate electronic file(s) if a single file becomes too large or if portions must be saved in a file format other than MS Word.
- 4) The **electronic file names** shall be a maximum of 25 characters long (including spaces, if any). The format of the electronic Universal Application shall be in the format: "A-3423-FacilityName". The "A" distinguishes the file as an application submittal, as opposed to other documents the Department itself puts into the database. Thus, all electronic application submittals should begin with "A-". Modifications to existing facilities should use the **core permit number** (i.e. '3423') the Department assigned to the facility as the next 4 digits. Use 'XXXX' for new facility applications. The format of any separate electronic submittals (additional submittals such as non-Word attachments, re-submittals, application updates) and Section document shall be in the format: "A-3423-9-description", where "9" stands for the **section #** (in this case Section 9-Public Notice). Please refrain, as much as possible, from submitting any scanned documents as this file format is extremely large, which uses up too much storage capacity in our database. Please take the time to fill out the **header information** throughout all submittals as this will identify any loose pages, including the Application Date (date submitted) & Revision number (0 for original, 1, 2, etc.; which will help keep track of subsequent partial update(s) to the original submittal. Do not use special symbols (#, @, etc.) in file names. The footer information should not be modified by the applicant.

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Table 2-A: Regulated Emission Sources

Unit and stack numbering must correspond throughout the application package. If applying for a NOI under 20.2.73 NMAC, equipment exemptions under 2.72.202 NMAC do not apply.

Unit Number ¹	Source Description	Make	Model #	Serial #	Manufacturer's Rated Capacity ³ (Specify Units)	Requested Permitted Capacity ³ (Specify Units)	Date of Manufacture ²	Controlled by Unit #	Source Classification Code (SCC)	For Each Piece of Equipment, Check One	RICE Ignition Type (CI, SI, 4SLB, 4SRB, 2SLB) ⁴	Replacing Unit No.	
							Date of Construction/Reconstruction ²	Emissions vented to Stack #					
E-1	3 MW Natural Gas Generator Engine	Jenbacher	J620	1147133	4,183 HP	4,183 HP	2015 TBD	OC-1, SCR-1 S-1	201002 02	☐ Existing (unchanged) ☒ New/Additional ☐ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced	4SLB	N/A
E-2	3 MW Natural Gas Generator Engine	Jenbacher	J620	1147143	4,183 HP	4,183 HP	2015 TBD	OC-2, SCR-2 S-2	201002 02	☐ Existing (unchanged) ☒ New/Additional ☐ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced	4SLB	N/A
E-3	3 MW Natural Gas Generator Engine	Jenbacher	J620	1004725	4,183 HP	4,183 HP	2010 TBD	OC-3, SCR-3 S-3	201002 02	☐ Existing (unchanged) ☒ New/Additional ☐ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced	4SLB	N/A
E-4	3 MW Natural Gas Generator Engine	Jenbacher	J620	1004713	4,183 HP	4,183 HP	2010 TBD	OC-4, SCR-4 S-4	201002 02	☐ Existing (unchanged) ☒ New/Additional ☐ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced	4SLB	N/A
E-5	3 MW Natural Gas Generator Engine	Jenbacher	J620	1004735	4,183 HP	4,183 HP	2010 TBD	OC-5, SCR-5 S-5	201002 02	☐ Existing (unchanged) ☒ New/Additional ☐ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced	4SLB	N/A
E-6	3 MW Natural Gas Generator Engine	Jenbacher	J620	1004723	4,183 HP	4,183 HP	2010 TBD	OC-6, SCR-6 S-6	201002 02	☐ Existing (unchanged) ☒ New/Additional ☐ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced	4SLB	N/A
E-7	4.5 MW Natural Gas Generator Engine	Jenbacher	J624	TBD	6,161 HP	6,161 HP	TBD TBD	OC-7, SCR-7 S-7	201002 02	☐ Existing (unchanged) ☒ New/Additional ☐ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced	4SLB	N/A
E-8	4.5 MW Natural Gas Generator Engine	Jenbacher	J624	TBD	6,161 HP	6,161 HP	TBD TBD	OC-8, SCR-8 S-8	201002 02	☐ Existing (unchanged) ☒ New/Additional ☐ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced	4SLB	N/A
E-9	4.5 MW Natural Gas Generator Engine	Jenbacher	J624	TBD	6,161 HP	6,161 HP	TBD TBD	OC-9, SCR-9 S-9	201002 02	☐ Existing (unchanged) ☒ New/Additional ☐ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced	4SLB	N/A
E-10	4.5 MW Natural Gas Generator Engine	Jenbacher	J624	TBD	6,161 HP	6,161 HP	TBD TBD	OC-10, SCR-10 S-10	201002 02	☐ Existing (unchanged) ☒ New/Additional ☐ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced	4SLB	N/A
E-11	4.5 MW Natural Gas Generator Engine	Jenbacher	J624	TBD	6,161 HP	6,161 HP	TBD TBD	OC-11, SCR-11 S-11	201002 02	☐ Existing (unchanged) ☒ New/Additional ☐ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced	4SLB	N/A
E-12	4.5 MW Natural Gas Generator Engine	Jenbacher	J624	TBD	6,161 HP	6,161 HP	TBD TBD	OC-12, SCR-12 S-12	201002 02	☐ Existing (unchanged) ☒ New/Additional ☐ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced	4SLB	N/A
E-13	4.5 MW Natural Gas Generator Engine	Jenbacher	J624	TBD	6,161 HP	6,161 HP	TBD TBD	OC-13, SCR-13 S-13	201002 02	☐ Existing (unchanged) ☒ New/Additional ☐ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced	4SLB	N/A
E-14	4.5 MW Natural Gas Generator Engine	Jenbacher	J624	TBD	6,161 HP	6,161 HP	TBD TBD	OC-14, SCR-14 S-14	201002 02	☐ Existing (unchanged) ☒ New/Additional ☐ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced	4SLB	N/A
E-15	4.5 MW Natural Gas Generator Engine	Jenbacher	J624	TBD	6,161 HP	6,161 HP	TBD TBD	OC-15, SCR-15 S-15	201002 02	☐ Existing (unchanged) ☒ New/Additional ☐ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced	4SLB	N/A
E-16	4.5 MW Natural Gas Generator Engine	Jenbacher	J624	TBD	6,161 HP	6,161 HP	TBD TBD	OC-16, SCR-16 S-16	201002 02	☐ Existing (unchanged) ☒ New/Additional ☐ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced	4SLB	N/A

¹ Unit numbers must correspond to unit numbers in the previous permit unless a complete cross reference table of all units in both permits is provided.² Specify dates required to determine regulatory applicability.³ To properly account for power conversion efficiencies, generator set rated capacity shall be reported as the rated capacity of the engine in horsepower, not the kilowatt capacity of the generator set.⁴ "4SLB" means four stroke lean burn engine, "4SRB" means four stroke rich burn engine, "2SLB" means two stroke lean burn engine, "CI" means compression ignition, and "SI" means spark ignition

Table 2-B: Insignificant Activities¹ (20.2.70 NMAC) OR Exempted Equipment (20.2.72 NMAC)

All 20.2.70 NMAC (Title V) applications must list all Insignificant Activities in this table. All 20.2.72 NMAC applications must list Exempted Equipment in this table. If equipment listed on this table is exempt under 20.2.72.202.B.5, include emissions calculations and emissions totals for 202.B.5 "similar functions" units, operations, and activities in Section 6, Calculations. Equipment and activities exempted under 20.2.72.202 NMAC may not necessarily be Insignificant under 20.2.70 NMAC (and vice versa). Unit & stack numbering must be consistent throughout the application package. Per Exemptions Policy 02-012.00 (see http://www.env.nm.gov/aqb/permit/aqb_pol.html), 20.2.72.202.B NMAC Exemptions do not apply, but 20.2.72.202.A NMAC exemptions do apply to NOI facilities under 20.2.73 NMAC. List 20.2.72.301.D.4 NMAC Auxiliary Equipment for Streamline applications in Table 2-A. The List of Insignificant Activities (for TV) can be found online at <https://www.env.nm.gov/wp-content/uploads/sites/2/2017/10/InsignificantListTitleV.pdf>. TV sources may elect to enter both TV Insignificant Activities and Part 72 Exemptions on this form.

Unit Number	Source Description	Manufacturer	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)	Date of Manufacture /Reconstruction ²	For Each Piece of Equipment, Check One
			Serial No.	Capacity Units	Insignificant Activity citation (e.g. IA List Item #1.a)	Date of Installation /Construction ²	
TK-1	Lube Oil Tank 1	TBD	TBD	TBD	20.2.72.202.B.(2) NMAC	TBD	☐ Existing (unchanged) ☐ To be Removed ☒ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
			TBD	TBD	IA List Item #5	TBD	
TK-2	Lube Oil Tank 2	TBD	TBD	TBD	20.2.72.202.B.(2) NMAC	TBD	☐ Existing (unchanged) ☐ To be Removed ☒ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
			TBD	TBD	IA List Item #5	TBD	
Fug	Fugitive Equipment leaks	N/A	N/A	N/A	20.2.72.202.B.(5) NMAC	TBD	☐ Existing (unchanged) ☐ To be Removed ☒ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
			N/A	N/A	IA List Item #1.a	TBD	
Road	Access Road	N/A	N/A	N/A	20.2.72.202.B.(5) NMAC	TBD	☐ Existing (unchanged) ☐ To be Removed ☒ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
			N/A	N/A	IA List Item #1.a	TBD	
							☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
							☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
							☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
							☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
							☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
							☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
							☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
							☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
							☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced

¹ Insignificant activities exempted due to size or production rate are defined in 20.2.70.300.D.6, 20.2.70.7.Q NMAC, and the NMED/AQB List of Insignificant Activities, dated September 15, 2008. Emissions from these insignificant activities do not need to be reported, unless specifically requested.

² Specify date(s) required to determine regulatory applicability.

Unit and stack numbering must correspond throughout the application package. Only list control equipment for TAPs if the TAP's maximum uncontrolled emissions rate is over its respective threshold as listed in 20.2.72 NMAC, Subpart V, Tables A and B. In accordance with 20.2.72.203.A(3) and (8) NMAC, 20.2.70.300.D(5)(b) and (e) NMAC, and 20.2.73.200.B(7) NMAC, the permittee shall report all control devices and list each pollutant controlled by the control device regardless if the applicant takes credit for the reduction in emissions.

¹ List each control device on a separate line. For each control device, list all emission units controlled by the control device.

Table 2-D: Maximum Emissions (under normal operating conditions)

☐ **This Table was intentionally left blank because it would be identical to Table 2-E.**

Maximum Emissions are the emissions at maximum capacity and prior to (in the absence of) pollution control, emission-reducing process equipment, or any other emission reduction. Calculate the hourly emissions using the worst case hourly emissions for each pollutant. For each pollutant, calculate the annual emissions as if the facility were operating at maximum plant capacity without pollution controls for 8760 hours per year, unless otherwise approved by the Department. List Hazardous Air Pollutants (HAP) & Toxic Air Pollutants (TAPs) in Table 2-I. Unit & stack numbering must be consistent throughout the application package. Fill all cells in this table with the emission numbers or a "-" symbol. A "-" symbol indicates that emissions of this pollutant are not expected. Numbers shall be expressed to at least 2 decimal points (e.g. 0.41, 1.41, or 1.41E-4).

Unit No.	NOx		CO		VOC		SOx		PM ¹		PM10 ¹		PM2.5 ¹		H ₂ S		Lead	
	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
E-1	9.42	41.28	19.98	87.51	1.13	4.95	0.06	0.25	0.26	1.15	0.26	1.15	0.26	1.15	--	--	--	--
E-2	9.42	41.28	19.98	87.51	1.13	4.95	0.06	0.25	0.26	1.15	0.26	1.15	0.26	1.15	--	--	--	--
E-3	9.42	41.28	19.98	87.51	1.13	4.95	0.06	0.25	0.26	1.15	0.26	1.15	0.26	1.15	--	--	--	--
E-4	9.42	41.28	19.98	87.51	1.13	4.95	0.06	0.25	0.26	1.15	0.26	1.15	0.26	1.15	--	--	--	--
E-5	9.42	41.28	19.98	87.51	1.13	4.95	0.06	0.25	0.26	1.15	0.26	1.15	0.26	1.15	--	--	--	--
E-6	9.42	41.28	19.98	87.51	1.13	4.95	0.06	0.25	0.26	1.15	0.26	1.15	0.26	1.15	--	--	--	--
E-7	12.50	54.73	25.81	113.04	1.45	6.35	0.07	0.33	0.34	1.48	0.34	1.48	0.34	1.48	--	--	--	--
E-8	12.50	54.73	25.81	113.04	1.45	6.35	0.07	0.33	0.34	1.48	0.34	1.48	0.34	1.48	--	--	--	--
E-9	12.50	54.73	25.81	113.04	1.45	6.35	0.07	0.33	0.34	1.48	0.34	1.48	0.34	1.48	--	--	--	--
E-10	12.50	54.73	25.81	113.04	1.45	6.35	0.07	0.33	0.34	1.48	0.34	1.48	0.34	1.48	--	--	--	--
E-11	12.50	54.73	25.81	113.04	1.45	6.35	0.07	0.33	0.34	1.48	0.34	1.48	0.34	1.48	--	--	--	--
E-12	12.50	54.73	25.81	113.04	1.45	6.35	0.07	0.33	0.34	1.48	0.34	1.48	0.34	1.48	--	--	--	--
E-13	12.50	54.73	25.81	113.04	1.45	6.35	0.07	0.33	0.34	1.48	0.34	1.48	0.34	1.48	--	--	--	--
E-14	12.50	54.73	25.81	113.04	1.45	6.35	0.07	0.33	0.34	1.48	0.34	1.48	0.34	1.48	--	--	--	--
E-15	12.50	54.73	25.81	113.04	1.45	6.35	0.07	0.33	0.34	1.48	0.34	1.48	0.34	1.48	--	--	--	--
E-16	12.50	54.73	25.81	113.04	1.45	6.35	0.07	0.33	0.34	1.48	0.34	1.48	0.34	1.48	--	--	--	--
Totals	181.50	794.99	377.94	1,655.40	21.29	93.25	1.09	4.79	4.96	21.70	4.96	21.70	4.96	21.70	0.00	0.00	0.00	0.00

¹**Condensable Particulate Matter:** Include condensable particulate matter emissions for PM10 and PM2.5 if the source is a combustion source. Do not include condensable particulate matter for PM unless PM is set equal to PM10 and PM2.5. Particulate matter (PM) is not subject to an ambient air quality standard, but PM is a regulated air pollutant under PSD (20.2.74 NMAC) and Title V (20.2.70 NMAC).

All applications for facilities that have emissions during routine or predictable startup, shutdown or scheduled maintenance (SSM)¹, including NOI applications, must include in this table the Maximum Emissions during routine or predictable startup, shutdown and scheduled maintenance (20.2.7 NMAC, 20.2.72.203.A.3 NMAC, 20.2.73.200.D.2 NMAC). In Section 6 and 6a, provide emissions calculations for all SSM emissions reported in this table. Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (https://www.env.nm.gov/aqb/permit/aqb_pol.html) for more detailed instructions. Numbers shall be expressed to at least 2 decimal points (e.g. 0.41, 1.41, or 1.41E-4).

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Table 2-G: Stack Exit and Fugitive Emission Rates for Special Stacks

☒ I have elected to leave this table blank because this facility does not have any stacks/vents that split emissions from a single source or combine emissions from more than one source listed in table 2-A. Additionally, the emission rates of all stacks match the Requested allowable emission rates stated in Table 2-E.

Use this table to list stack emissions (requested allowable) from split and combined stacks. List Toxic Air Pollutants (TAPs) and Hazardous Air Pollutants (HAPs) in Table 2-I. List all fugitives that are associated with the normal, routine, and non-emergency operation of the facility. Unit and stack numbering must correspond throughout the application package. Refer to Table 2-E for instructions on use of the “-“ symbol and on significant figures.

[illegible]

Table 2-H: Stack Exit Conditions

Unit and stack numbering must correspond throughout the application package. Include the stack exit conditions for each unit that emits from a stack, including blowdown venting parameters and tank emissions. If the facility has multiple operating scenarios, complete a separate Table 2-H for each scenario and, for each, type scenario name here:

Stack Number	Serving Unit Number(s) from Table 2-A	Orientation (H=Horizontal V=Vertical)	Rain Caps (Yes or No)	Height Above Ground (ft)	Temp. (F)	Flow Rate		Moisture by Volume (%)	Velocity (ft/sec)	Inside Diameter (ft)
						(acfs)	(dscfs)			
S-1	E-1	V	N	70	780	122.68	N/A	N/A	56.23	1.67
S-2	E-2	V	N	70	780	122.68	N/A	N/A	56.23	1.67
S-3	E-3	V	N	70	780	122.68	N/A	N/A	56.23	1.67
S-4	E-4	V	N	70	780	122.68	N/A	N/A	56.23	1.67
S-5	E-5	V	N	70	780	122.68	N/A	N/A	56.23	1.67
S-6	E-6	V	N	70	780	122.68	N/A	N/A	56.23	1.67
S-7	E-7	V	N	36	697	161.33	N/A	N/A	37.73	2.33
S-8	E-8	V	N	36	697	161.33	N/A	N/A	37.73	2.33
S-9	E-9	V	N	36	697	161.33	N/A	N/A	37.73	2.33
S-10	E-10	V	N	36	697	161.33	N/A	N/A	37.73	2.33
S-11	E-11	V	N	36	697	161.33	N/A	N/A	37.73	2.33
S-12	E-12	V	N	36	697	161.33	N/A	N/A	37.73	2.33
S-13	E-13	V	N	36	697	161.33	N/A	N/A	37.73	2.33
S-14	E-14	V	N	36	697	161.33	N/A	N/A	37.73	2.33
S-15	E-15	V	N	36	697	161.33	N/A	N/A	37.73	2.33
S-16	E-16	V	N	36	697	161.33	N/A	N/A	37.73	2.33

Table 2-I: Stack Exit and Fugitive Emission Rates for HAPs and TAPs

In the table below, report the Potential to Emit for each HAP from each regulated emission unit listed in Table 2-A, only if the entire facility emits the HAP at a rate greater than or equal to one (1) ton per year. For each such emission unit, HAPs shall be reported to the nearest 0.1 tpy. Each facility-wide Individual HAP total and the facility-wide Total HAPs shall be the sum of all HAP sources calculated to the nearest 0.1 ton per year. Per 20.2.72.403.A.1 NMAC, facilities not exempt [see 20.2.72.402.C NMAC] from TAP permitting shall report each TAP that has an uncontrolled emission rate in excess of its pounds per hour screening level specified in 20.2.72.502 NMAC. TAPs shall be reported using one more significant figure than the number of significant figures shown in the pound per hour threshold corresponding to the substance. Use the HAP nomenclature as it appears in Section 112 (b) of the 1990 CAAA and the TAP nomenclature as it listed in 20.2.72.502 NMAC. Include tank-flashing emissions estimates of HAPs in this table. For each HAP or TAP listed, fill all cells in this table with the emission numbers or a "-" symbol. A "-" symbol indicates that emissions of this pollutant are not expected or the pollutant is emitted in a quantity less than the threshold amounts described above.

Stack No.	Unit No.(s)	Total HAPs		Formaldehyde		Ammonia		Acetaldehyde		Acroline		Methanol		n-Hexane		Provide Pollutant Name Here		Provide Pollutant Name Here	
				☒ HAP or ☐ TAP	☐ HAP or ☒ TAP	☒ HAP or ☐ TAP	☐ HAP or ☒ TAP	☒ HAP or ☐ TAP	☐ HAP or ☒ TAP	☒ HAP or ☐ TAP	☐ HAP or ☒ TAP	☐ HAP or ☒ TAP	☐ HAP or ☒ TAP						
		lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
S-1	E-1	0.99	4.34	0.74	3.22	0.44	1.92	0.11	0.48	0.07	0.30	0.03	0.14	0.01	0.06				
S-2	E-2	0.99	4.34	0.74	3.22	0.44	1.92	0.11	0.48	0.07	0.30	0.03	0.14	0.01	0.06				
S-3	E-3	0.99	4.34	0.74	3.22	0.44	1.92	0.11	0.48	0.07	0.30	0.03	0.14	0.01	0.06				
S-4	E-4	0.99	4.34	0.74	3.22	0.44	1.92	0.11	0.48	0.07	0.30	0.03	0.14	0.01	0.06				
S-5	E-5	0.99	4.34	0.74	3.22	0.44	1.92	0.11	0.48	0.07	0.30	0.03	0.14	0.01	0.06				
S-6	E-6	0.99	4.34	0.74	3.22	0.44	1.92	0.11	0.48	0.07	0.30	0.03	0.14	0.01	0.06				
S-7	E-7	0.84	3.67	0.51	2.23	0.47	2.05	0.14	0.62	0.09	0.38	0.04	0.19	0.02	0.08				
S-8	E-8	0.84	3.67	0.51	2.23	0.47	2.05	0.14	0.62	0.09	0.38	0.04	0.19	0.02	0.08				
S-9	E-9	0.84	3.67	0.51	2.23	0.47	2.05	0.14	0.62	0.09	0.38	0.04	0.19	0.02	0.08				
S-10	E-10	0.84	3.67	0.51	2.23	0.47	2.05	0.14	0.62	0.09	0.38	0.04	0.19	0.02	0.08				
S-11	E-11	0.84	3.67	0.51	2.23	0.47	2.05	0.14	0.62	0.09	0.38	0.04	0.19	0.02	0.08				
S-12	E-12	0.84	3.67	0.51	2.23	0.47	2.05	0.14	0.62	0.09	0.38	0.04	0.19	0.02	0.08				
S-13	E-13	0.84	3.67	0.51	2.23	0.47	2.05	0.14	0.62	0.09	0.38	0.04	0.19	0.02	0.08				
S-14	E-14	0.84	3.67	0.51	2.23	0.47	2.05	0.14	0.62	0.09	0.38	0.04	0.19	0.02	0.08				
S-15	E-15	0.84	3.67	0.51	2.23	0.47	2.05	0.14	0.62	0.09	0.38	0.04	0.19	0.02	0.08				
S-16	E-16	0.84	3.67	0.51	2.23	0.47	2.05	0.14	0.62	0.09	0.38	0.04	0.19	0.02	0.08				
Totals:		14.30	62.71	9.49	41.62	7.32	32.06	2.07	9.08	1.28	5.59	0.62	2.72	0.27	1.20	0	0	0	0

Table 2-J: Fuel

Specify fuel characteristics and usage. Unit and stack numbering must correspond throughout the application package.

Unit No.	Fuel Type (low sulfur Diesel, ultra low sulfur diesel, Natural Gas, Coal, ...)	Fuel Source: purchased commercial, pipeline quality natural gas, residue gas, raw/field natural gas, process gas (e.g. SRU tail gas) or other	Specify Units				
			Lower Heating Value	Hourly Usage	Annual Usage	% Sulfur	% Ash
E-1	Natural Gas	Pipeline Quality Natural Gas	1,008	8,760	229.23 MMscf/yr	7,500 gr/MMscf	N/A
E-2	Natural Gas	Pipeline Quality Natural Gas	1,008	8,760	229.23 MMscf/yr	7,500 gr/MMscf	N/A
E-3	Natural Gas	Pipeline Quality Natural Gas	1,008	8,760	229.23 MMscf/yr	7,500 gr/MMscf	N/A
E-4	Natural Gas	Pipeline Quality Natural Gas	1,008	8,760	229.23 MMscf/yr	7,500 gr/MMscf	N/A
E-5	Natural Gas	Pipeline Quality Natural Gas	1,008	8,760	229.23 MMscf/yr	7,500 gr/MMscf	N/A
E-6	Natural Gas	Pipeline Quality Natural Gas	1,008	8,760	229.23 MMscf/yr	7,500 gr/MMscf	N/A
E-7	Natural Gas	Pipeline Quality Natural Gas	1,008	8,760	293.73 MMscf/yr	7,500 gr/MMscf	N/A
E-8	Natural Gas	Pipeline Quality Natural Gas	1,008	8,760	293.73 MMscf/yr	7,500 gr/MMscf	N/A
E-9	Natural Gas	Pipeline Quality Natural Gas	1,008	8,760	293.73 MMscf/yr	7,500 gr/MMscf	N/A
E-10	Natural Gas	Pipeline Quality Natural Gas	1,008	8,760	293.73 MMscf/yr	7,500 gr/MMscf	N/A
E-11	Natural Gas	Pipeline Quality Natural Gas	1,008	8,760	293.73 MMscf/yr	7,500 gr/MMscf	N/A
E-12	Natural Gas	Pipeline Quality Natural Gas	1,008	8,760	293.73 MMscf/yr	7,500 gr/MMscf	N/A
E-13	Natural Gas	Pipeline Quality Natural Gas	1,008	8,760	293.73 MMscf/yr	7,500 gr/MMscf	N/A
E-14	Natural Gas	Pipeline Quality Natural Gas	1,008	8,760	293.73 MMscf/yr	7,500 gr/MMscf	N/A
E-15	Natural Gas	Pipeline Quality Natural Gas	1,008	8,760	293.73 MMscf/yr	7,500 gr/MMscf	N/A
E-16	Natural Gas	Pipeline Quality Natural Gas	1,008	8,760	293.73 MMscf/yr	7,500 gr/MMscf	N/A

Table 2-L: Tank Data

Include appropriate tank-flashing modeling input data. Use an addendum to this table for unlisted data categories. Unit and stack numbering must correspond throughout the application package. Use additional sheets if necessary. See reference Table 2-L2. Note: 1.00 bbl = 10.159 M3 = 42.0 gal

[illegible]

Table 2-L2: Liquid Storage Tank Data Codes Reference Table

Roof Type	Seal Type, Welded Tank Seal Type		Seal Type, Riveted Tank Seal Type		Roof, Shell Color	Paint Condition
FX: Fixed Roof	Mechanical Shoe Seal	Liquid-mounted resilient seal	Vapor-mounted resilient seal	Seal Type	WH: White	Good
IF: Internal Floating Roof	A: Primary only	A: Primary only	A: Primary only	A: Mechanical shoe, primary only	AS: Aluminum (specular)	Poor
EF: External Floating Roof	B: Shoe-mounted secondary	B: Weather shield	B: Weather shield	B: Shoe-mounted secondary	AD: Aluminum (diffuse)	
P: Pressure	C: Rim-mounted secondary	C: Rim-mounted secondary	C: Rim-mounted secondary	C: Rim-mounted secondary	LG: Light Gray	
Note: 1.00 bbl = 0.159 M ³ = 42.0 gal					MG: Medium Gray	
					BL: Black	
					OT: Other (specify)	

Note: $1.00 \text{ bbl} = 0.159 \text{ M}^3 = 42.0 \text{ gal}$

Table 2-M: Materials Processed and Produced (Use additional sheets as necessary.)

[illegible]

Table 2-N: CEM Equipment

Enter Continuous Emissions Measurement (CEM) Data in this table. If CEM data will be used as part of a federally enforceable permit condition, or used to satisfy the requirements of a state or federal regulation, include a copy of the CEM's manufacturer specification sheet in the Information Used to Determine Emissions attachment. Unit and stack numbering must correspond throughout the application package. Use additional sheets if necessary.

[illegible]

Table 2-O: Parametric Emissions Measurement Equipment

Unit and stack numbering must correspond throughout the application package. Use additional sheets if necessary.

[illegible]

Table 2-P: Greenhouse Gas Emissions

Applications submitted under 20.2.70, 20.2.72, & 20.2.74 NMAC are required to complete this Table. Power plants, Title V major sources, and PSD major sources must report and calculate all GHG emissions for each unit. Applicants must report potential emission rates in short tons per year (see Section 6.a for assistance). Include GHG emissions during Startup, Shutdown, and Scheduled Maintenance in this table. For minor source facilities that are not power plants, are not Title V, or are not PSD, there are three options for reporting GHGs 1) report GHGs for each individual piece of equipment; 2) report all GHGs from a group of unit types, for example report all combustion source GHGs as a single unit and all venting GHG as a second separate unit; OR 3) check the following box ☐ By checking this box, the applicant acknowledges the total CO₂e emissions are less than 75,000 tons per year.

		CO ₂ ton/yr	N ₂ O ton/yr	CH ₄ ton/yr	SF ₆ ton/yr	PFC/HFC ton/yr ²										Total GHG Mass Basis ton/yr ⁴	Total CO ₂ e ton/yr ⁵
Unit No.	GWPs ¹	1	298	25	22,800	footnote 3											
E-1	mass GHG	12,706.61	0.03	144.39	--	--										12,851.03	--
	CO ₂ e	12,706.61	7.92	3,609.83	--	--										--	16,324.35
E-2	mass GHG	12,706.61	0.03	144.39	--	--										12,851.03	--
	CO ₂ e	12,706.61	7.92	3,609.83	--	--										--	16,324.35
E-3	mass GHG	12,706.61	0.03	144.39	--	--										12,851.03	--
	CO ₂ e	12,706.61	7.92	3,609.83	--	--										--	16,324.35
E-4	mass GHG	12,706.61	0.03	144.39	--	--										12,851.03	--
	CO ₂ e	12,706.61	7.92	3,609.83	--	--										--	16,324.35
E-5	mass GHG	12,706.61	0.03	144.39	--	--										12,851.03	--
	CO ₂ e	12,706.61	7.92	3,609.83	--	--										--	16,324.35
E-6	mass GHG	12,706.61	0.03	144.39	--	--										12,851.03	--
	CO ₂ e	12,706.61	7.92	3,609.83	--	--										--	16,324.35
E-7	mass GHG	16,281.51	0.03	185.02	--	--										16,466.56	--
	CO ₂ e	16,281.51	10.15	4,625.43	--	--										--	20,917.08
E-8	mass GHG	16,281.51	0.03	185.02	--	--										16,466.56	--
	CO ₂ e	16,281.51	10.15	4,625.43	--	--										--	20,917.08
E-9	mass GHG	16,281.51	0.03	185.02	--	--										16,466.56	--
	CO ₂ e	16,281.51	10.15	4,625.43	--	--										--	20,917.08
E-10	mass GHG	16,281.51	0.03	185.02	--	--										16,466.56	--
	CO ₂ e	16,281.51	10.15	4,625.43	--	--										--	20,917.08
E-11	mass GHG	16,281.51	0.03	185.02	--	--										16,466.56	--
	CO ₂ e	16,281.51	10.15	4,625.43	--	--										--	20,917.08
E-12	mass GHG	16,281.51	0.03	185.02	--	--										16,466.56	--
	CO ₂ e	16,281.51	10.15	4,625.43	--	--										--	20,917.08
E-13	mass GHG	16,281.51	0.03	185.02	--	--										16,466.56	--
	CO ₂ e	16,281.51	10.15	4,625.43	--	--										--	20,917.08
E-14	mass GHG	16,281.51	0.03	185.02	--	--										16,466.56	--
	CO ₂ e	16,281.51	10.15	4,625.43	--	--										--	20,917.08
E-15	mass GHG	16,281.51	0.03	185.02	--	--										16,466.56	--
	CO ₂ e	16,281.51	10.15	4,625.43	--	--										--	20,917.08
E-16	mass GHG	16,281.51	0.03	185.02	--	--										16,466.56	--
	CO ₂ e	16,281.51	10.15	4,625.43	--	--										--	20,917.08
Total	mass GHG	239,054.72	0.50	2,716.53	--	--										241,771.75	--
	CO ₂ e	239,054.72	148.98	67,913.28	--	--										--	307,116.97

¹ GWP (Global Warming Potential): Applicants must use the most current GWPs codified in Table A-1 of 40 CFR part 98. GWPs are subject to change, therefore, applicants need to check 40 CFR 98 to confirm GWP values.

² For HFCs or PFCs describe the specific HFC or PFC compound and use a separate column for each individual compound.

³ For each new compound, enter the appropriate GWP for each HFC or PFC compound from Table A-1 in 40 CFR 98.

⁴ Green house gas emissions on a **mass basis** is the ton per year green house gas emission before adjustment with its GWP.

⁵ CO₂e means Carbon Dioxide Equivalent and is calculated by multiplying the TPY mass emissions of the green house gas by its GWP.

Section 3

Application Summary

The **Application Summary** shall include a brief description of the facility and its process, the type of permit application, the applicable regulation (i.e. 20.2.72.200.A.X, or 20.2.73 NMAC) under which the application is being submitted, and any air quality permit numbers associated with this site. If this facility is to be collocated with another facility, provide details of the other facility including permit number(s). In case of a revision or modification to a facility, provide the lowest level regulatory citation (i.e. 20.2.72.219.B.1.d NMAC) under which the revision or modification is being requested. Also describe the proposed changes from the original permit, how the proposed modification will affect the facility's operations and emissions, de-bottlenecking impacts, and changes to the facility's major/minor status (both PSD & Title V).

The **Process Summary** shall include a brief description of the facility and its processes.

Startup, Shutdown, and Maintenance (SSM) routine or predictable emissions: Provide an overview of how SSM emissions are accounted for in this application. Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (http://www.env.nm.gov/aqb/permit/app_form.html) for more detailed instructions on SSM emissions.

Application Summary

Saddle Butte Energy Farmington LLC (SBE) is submitting this application for the construction of a power plant (Westside Station or facility) to be located in San Juan County, New Mexico. The facility will generate power by utilizing various natural gas-fired lean-burn engines. The facility will be considered a synthetic minor source for Prevention of Significant Deterioration (PSD) rules. In addition, the facility will be a major source for Title V rules and HAP.

The following units will be installed at this facility:

- Six Jenbacher JGC620 4-Stroke Lean Burn engines each rated 4,581 brake-horsepower (bhp)
- Ten Jenbacher JGC624 4-Stroke Lean Burn engines each rated 6,161 bhp

The engines will be equipped with oxidation catalysts to control carbon monoxide (CO), volatile organic compounds (VOC), formaldehyde, and other hazardous air pollutants (HAP) emissions. Additionally, the engines will be equipped with selective catalytic reduction (SCR) to control nitrogen oxides (NO_x).

Process Summary

Pipeline quality natural gas will enter the facility and be directed to the various natural gas-fired engines. The engines will drive electric generators. The electricity produced will go through transformer before entering the electric grid. The engine exhaust will be routed through an oxidation catalyst to control CO, VOC and HAPs, then to and SCR where urea will be injected to control NO_x emissions before being released to atmosphere. Lube oil will also be circulated to the engines from tanks on site. This power plant will provide electricity to the power grid during periods of peak demand.

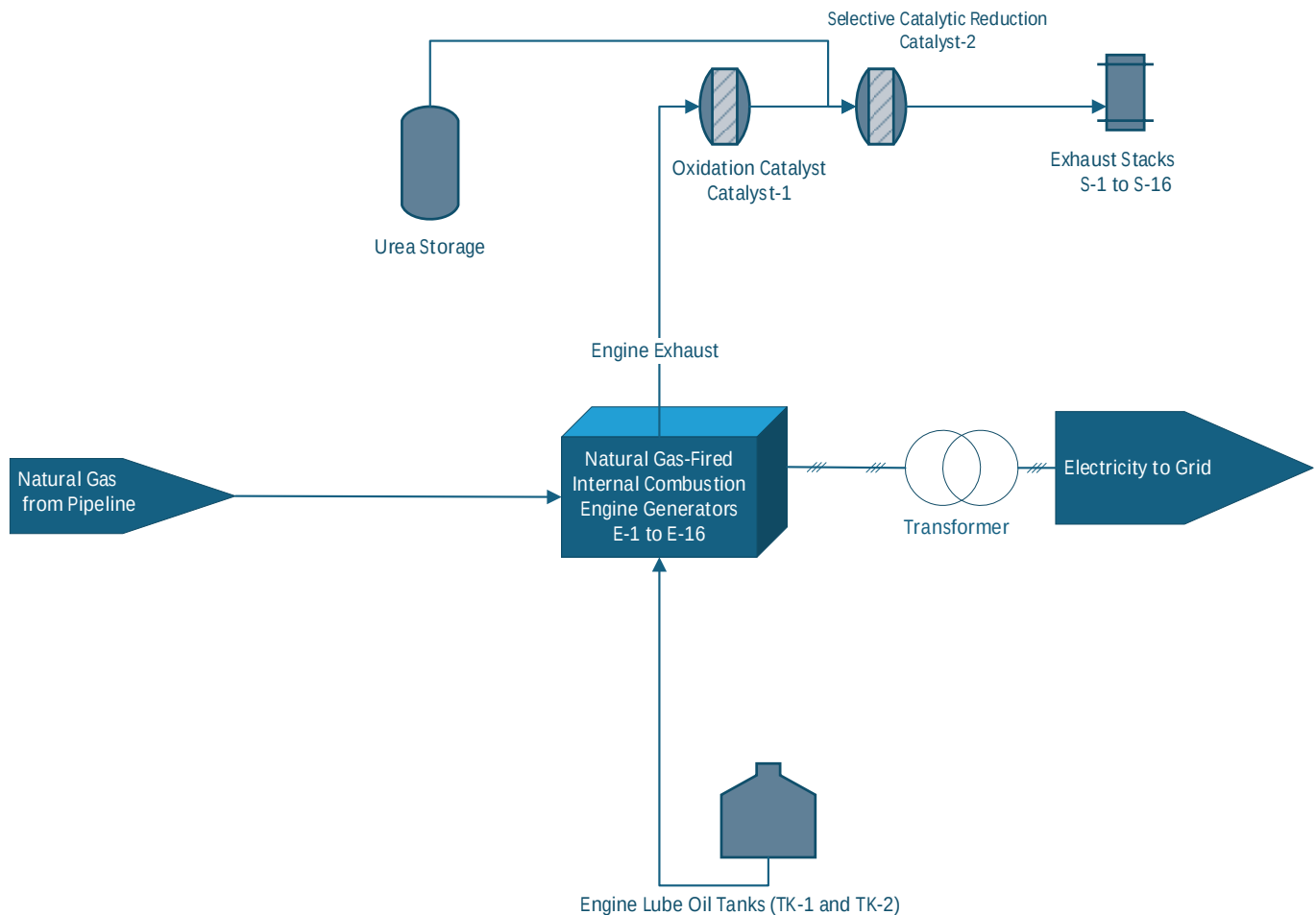
Startup, Shutdown, and Maintenance (SSM)

During startup and shutdown the facility is expected to operate at a lower load which will have less associated emissions. The engines will be equipped with oxidation catalysts to control carbon monoxide (CO), volatile organic compounds (VOC), formaldehyde, and other hazardous air pollutants (HAP) emissions. The engines will also be equipped with selective catalytic reduction (SCR) to control nitrogen oxides (NO_x). Additionally, the catalytic converter(s) requires about fifteen minutes to reach operating temperature, therefore, the uncontrolled emissions associated with the catalytic converter(s) are not expected to exceed the allowable emission limits when included in the averaging time in addition to the controlled emissions.

Section 4

Process Flow Sheet

A **process flow sheet** and/or block diagram indicating the individual equipment, all emission points and types of control applied to those points. The unit numbering system should be consistent throughout this application.

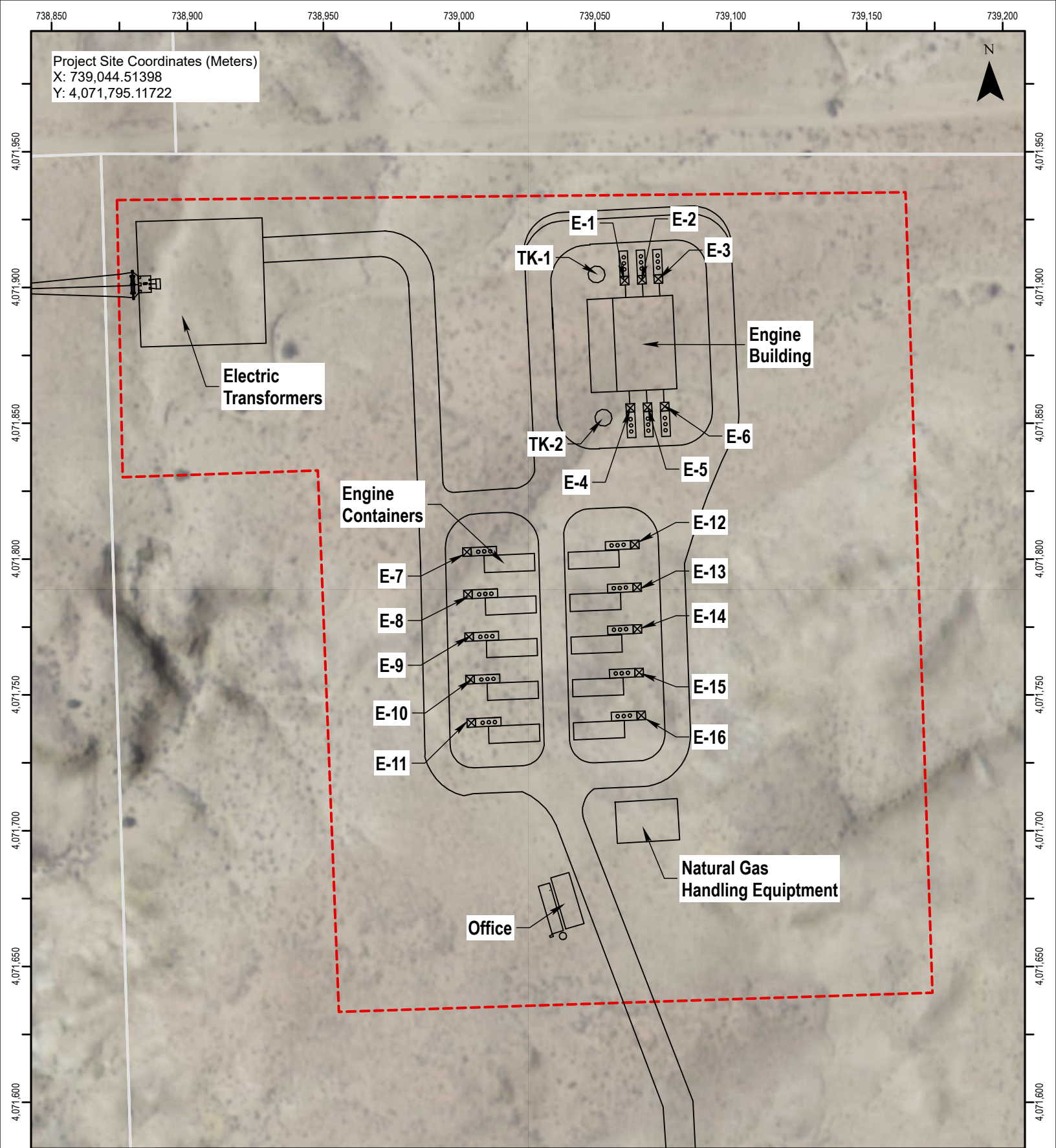


Section 5

Plot Plan Drawn To Scale

A **plot plan drawn to scale** showing emissions points, roads, structures, tanks, and fences of property owned, leased, or under direct control of the applicant. This plot plan must clearly designate the restricted area as defined in UA1, Section 1-D.12. The unit numbering system should be consistent throughout this application.

A plot plan is provided on the following page.



Project Site Coordinates (Meters)
X: 739,044.51398
Y: 4,071,795.11722



Electric
Transformers

Engine
Building

Engine
Containers

Natural Gas
Handling Equipment

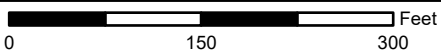
Office

Key:

Proposed Facility
Site Features
Fenceline

Roads
Paved
Unpaved
Parcels

Proposed Westside Station Plot Plan



Date: 9/9/2025

NAD 1983 UTM Zone 12N

Sources: Esri, Maxar, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap, and the GIS user community, Esri, USDA Farm Service Agency

Section 6

All Calculations

Show all calculations used to determine both the hourly and annual controlled and uncontrolled emission rates. All calculations shall be performed keeping a minimum of three significant figures. Document the source of each emission factor used (if an emission rate is carried forward and not revised, then a statement to that effect is required). If identical units are being permitted and will be subject to the same operating conditions, submit calculations for only one unit and a note specifying what other units to which the calculations apply. All formulas and calculations used to calculate emissions must be submitted. The "Calculations" tab in the UA2 has been provided to allow calculations to be linked to the emissions tables. Add additional "Calc" tabs as needed. If the UA2 or other spread sheets are used, all calculation spread sheet(s) shall be submitted electronically in Microsoft Excel compatible format so that formulas and input values can be checked. Format all spread sheets and calculations such that the reviewer can follow the logic and verify the input values. Define all variables. If calculation spread sheets are not used, provide the original formulas with defined variables. Additionally, provide subsequent formulas showing the input values for each variable in the formula. All calculations, including those calculations are imbedded in the Calc tab of the UA2 portion of the application, the printed Calc tab(s), should be submitted under this section.

Tank Flashing Calculations: The information provided to the AQB shall include a discussion of the method used to estimate tank-flashing emissions, relative thresholds (i.e., NOI, permit, or major source (NSPS, PSD or Title V)), accuracy of the model, the input and output from simulation models and software, all calculations, documentation of any assumptions used, descriptions of sampling methods and conditions, copies of any lab sample analysis. If Hysis is used, all relevant input parameters shall be reported, including separator pressure, gas throughput, and all other relevant parameters necessary for flashing calculation.

SSM Calculations: It is the applicant's responsibility to provide an estimate of SSM emissions or to provide justification for not doing so. In this Section, provide emissions calculations for Startup, Shutdown, and Routine Maintenance (SSM) emissions listed in the Section 2 SSM and/or Section 22 GHG Tables and the rational for why the others are reported as zero (or left blank in the SSM/GHG Tables). Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (http://www.env.nm.gov/aqb/permit/app_form.html) for more detailed instructions on calculating SSM emissions. If SSM emissions are greater than those reported in the Section 2, Requested Allowables Table, modeling may be required to ensure compliance with the standards whether the application is NSR or Title V. Refer to the Modeling Section of this application for more guidance on modeling requirements.

Glycol Dehydrator Calculations: The information provided to the AQB shall include the manufacturer's maximum design recirculation rate for the glycol pump. If GRI-Glycalc is used, the full input summary report shall be included as well as a copy of the gas analysis that was used.

Road Calculations: Calculate fugitive particulate emissions and enter haul road fugitives in Tables 2-A, 2-D and 2-E for:

1. If you transport raw material, process material and/or product into or out of or within the facility and have PER emissions greater than 0.5 tpy.
2. If you transport raw material, process material and/or product into or out of the facility more frequently than one round trip per day.

Significant Figures:

A. All emissions standards are deemed to have at least two significant figures, but not more than three significant figures.

B. At least 5 significant figures shall be retained in all intermediate calculations.

C. In calculating emissions to determine compliance with an emission standard, the following rounding off procedures shall be used:

- (1) If the first digit to be discarded is less than the number 5, the last digit retained shall not be changed;
- (2) If the first digit discarded is greater than the number 5, or if it is the number 5 followed by at least one digit other than the number zero, the last figure retained shall be increased by one unit; **and**
- (3) If the first digit discarded is exactly the number 5, followed only by zeros, the last digit retained shall be rounded upward if it is an odd number, but no adjustment shall be made if it is an even number.
- (4) The final result of the calculation shall be expressed in the units of the standard.

Control Devices: In accordance with 20.2.72.203.A(3) and (8) NMAC, 20.2.70.300.D(5)(b) and (e) NMAC, and 20.2.73.200.B(7) NMAC, the permittee shall report all control devices and list each pollutant controlled by the control device regardless if the applicant takes credit for the reduction in emissions. The applicant can indicate in this section of the

application if they chose to not take credit for the reduction in emission rates. For notices of intent submitted under 20.2.73 NMAC, only uncontrolled emission rates can be considered to determine applicability unless the state or federal Acts require the control. This information is necessary to determine if federally enforceable conditions are necessary for the control device, and/or if the control device produces its own regulated pollutants or increases emission rates of other pollutants.

Table C- Civitas North - Allred 8-59-30 Production Facility
Estimated Potential Criteria & HAP Pollutant Emissions

ID	Emission Unit	Annual Criteria Emission Rates - Uncontrolled						Greenhouse Gases - Uncontrolled				Annual HAPs - Uncontrolled					
		NO _x	CO	VOC	SO ₂	PM ₁₀	PM _{2.5}	CO ₂	CH ₄	N ₂ O	CO ₂ e	Ammonia	HCHO	Acetal	Acro	N-Hex	Meth
E-1	Jenbacher JGC 620	41.3 tpy	87.5 tpy	5.0 tpy	0.3 tpy	1.2 tpy	1.2 tpy	12,706.6 tpy	144.39 tpy	0.027 tpy	16,324 tpy	1.9 tpy	10.7 tpy	1.0 tpy	0.6 tpy	0.1 tpy	0.3 tpy
E-2	Jenbacher JGC 620	41.3 tpy	87.5 tpy	5.0 tpy	0.3 tpy	1.2 tpy	1.2 tpy	12,706.6 tpy	144.39 tpy	0.027 tpy	16,324 tpy	1.9 tpy	10.7 tpy	1.0 tpy	0.6 tpy	0.1 tpy	0.3 tpy
E-3	Jenbacher JGC 620	41.3 tpy	87.5 tpy	5.0 tpy	0.3 tpy	1.2 tpy	1.2 tpy	12,706.6 tpy	144.39 tpy	0.027 tpy	16,324 tpy	1.9 tpy	10.7 tpy	1.0 tpy	0.6 tpy	0.1 tpy	0.3 tpy
E-4	Jenbacher JGC 620	41.3 tpy	87.5 tpy	5.0 tpy	0.3 tpy	1.2 tpy	1.2 tpy	12,706.6 tpy	144.39 tpy	0.027 tpy	16,324 tpy	1.9 tpy	10.7 tpy	1.0 tpy	0.6 tpy	0.1 tpy	0.3 tpy
E-5	Jenbacher JGC 620	41.3 tpy	87.5 tpy	5.0 tpy	0.3 tpy	1.2 tpy	1.2 tpy	12,706.6 tpy	144.39 tpy	0.027 tpy	16,324 tpy	1.9 tpy	10.7 tpy	1.0 tpy	0.6 tpy	0.1 tpy	0.3 tpy
E-6	Jenbacher JGC 620	41.3 tpy	87.5 tpy	5.0 tpy	0.3 tpy	1.2 tpy	1.2 tpy	12,706.6 tpy	144.39 tpy	0.027 tpy	16,324 tpy	1.9 tpy	10.7 tpy	1.0 tpy	0.6 tpy	0.1 tpy	0.3 tpy
E-7	Jenbacher JGC 624	54.7 tpy	113.0 tpy	6.4 tpy	0.3 tpy	1.5 tpy	1.5 tpy	16,281.5 tpy	185.02 tpy	0.034 tpy	20,917 tpy	2.1 tpy	7.4 tpy	1.2 tpy	0.8 tpy	0.2 tpy	0.4 tpy
E-8	Jenbacher JGC 624	54.7 tpy	113.0 tpy	6.4 tpy	0.3 tpy	1.5 tpy	1.5 tpy	16,281.5 tpy	185.02 tpy	0.034 tpy	20,917 tpy	2.1 tpy	7.4 tpy	1.2 tpy	0.8 tpy	0.2 tpy	0.4 tpy
E-9	Jenbacher JGC 624	54.7 tpy	113.0 tpy	6.4 tpy	0.3 tpy	1.5 tpy	1.5 tpy	16,281.5 tpy	185.02 tpy	0.034 tpy	20,917 tpy	2.1 tpy	7.4 tpy	1.2 tpy	0.8 tpy	0.2 tpy	0.4 tpy
E-10	Jenbacher JGC 624	54.7 tpy	113.0 tpy	6.4 tpy	0.3 tpy	1.5 tpy	1.5 tpy	16,281.5 tpy	185.02 tpy	0.034 tpy	20,917 tpy	2.1 tpy	7.4 tpy	1.2 tpy	0.8 tpy	0.2 tpy	0.4 tpy
E-11	Jenbacher JGC 624	54.7 tpy	113.0 tpy	6.4 tpy	0.3 tpy	1.5 tpy	1.5 tpy	16,281.5 tpy	185.02 tpy	0.034 tpy	20,917 tpy	2.1 tpy	7.4 tpy	1.2 tpy	0.8 tpy	0.2 tpy	0.4 tpy
E-12	Jenbacher JGC 624	54.7 tpy	113.0 tpy	6.4 tpy	0.3 tpy	1.5 tpy	1.5 tpy	16,281.5 tpy	185.02 tpy	0.034 tpy	20,917 tpy	2.1 tpy	7.4 tpy	1.2 tpy	0.8 tpy	0.2 tpy	0.4 tpy
E-13	Jenbacher JGC 624	54.7 tpy	113.0 tpy	6.4 tpy	0.3 tpy	1.5 tpy	1.5 tpy	16,281.5 tpy	185.02 tpy	0.034 tpy	20,917 tpy	2.1 tpy	7.4 tpy	1.2 tpy	0.8 tpy	0.2 tpy	0.4 tpy
E-14	Jenbacher JGC 624	54.7 tpy	113.0 tpy	6.4 tpy	0.3 tpy	1.5 tpy	1.5 tpy	16,281.5 tpy	185.02 tpy	0.034 tpy	20,917 tpy	2.1 tpy	7.4 tpy	1.2 tpy	0.8 tpy	0.2 tpy	0.4 tpy
E-15	Jenbacher JGC 624	54.7 tpy	113.0 tpy	6.4 tpy	0.3 tpy	1.5 tpy	1.5 tpy	16,281.5 tpy	185.02 tpy	0.034 tpy	20,917 tpy	2.1 tpy	7.4 tpy	1.2 tpy	0.8 tpy	0.2 tpy	0.4 tpy
E-16	Jenbacher JGC 624	54.7 tpy	113.0 tpy	6.4 tpy	0.3 tpy	1.5 tpy	1.5 tpy	16,281.5 tpy	185.02 tpy	0.034 tpy	20,917 tpy	2.1 tpy	7.4 tpy	1.2 tpy	0.8 tpy	0.2 tpy	0.4 tpy
TK-1	Lube oil tank	--	--	0.0 tpy	--	--	--	--	--	--	--	--	--	--	--	--	--
TK-2	Lube oil tank	--	--	0.0 tpy	--	--	--	--	--	--	--	--	--	--	--	--	--
Fug	Fugitive Equipment Leaks	--	--	0.0 tpy	--	--	--	0.1 tpy	29.91 tpy	0.000 tpy	748 tpy	--	--	--	--	--	--
Dust	Access Road Emissions	--	--	--	--	0.3 tpy	0.0 tpy	--	--	--	--	--	--	--	--	--	--
Facility Totals		795.0 tpy	1,655.4 tpy	93.3 tpy	4.8 tpy	22.0 tpy	21.7 tpy	239,054.8 tpy	2,746.45 tpy	0.500 tpy	307,865 tpy	32.1 tpy	138.6 tpy	18.2 tpy	11.2 tpy	2.4 tpy	5.4 tpy

ID	Emission Unit	Annual Emission Rates - Controlled						Greenhouse Gases - Controlled				Annual HAPs - Controlled					
		NO _x	CO	VOC	SO ₂	PM ₁₀	PM _{2.5}	CO ₂	CH ₄	N ₂ O	CO ₂ e	Ammonia	HCHO	Acetal	Acro	N-Hex	Meth
E-1	Jenbacher JGC 620	8.3 tpy	6.1 tpy	2.5 tpy	0.3 tpy	1.2 tpy	1.2 tpy	12,706.6 tpy	144.39 tpy	0.027 tpy	16,324 tpy	1.9 tpy	3.2 tpy	0.5 tpy	0.3 tpy	0.1 tpy	0.1 tpy
E-2	Jenbacher JGC 620	8.3 tpy	6.1 tpy	2.5 tpy	0.3 tpy	1.2 tpy	1.2 tpy	12,706.6 tpy	144.39 tpy	0.027 tpy	16,324 tpy	1.9 tpy	3.2 tpy	0.5 tpy	0.3 tpy	0.1 tpy	0.1 tpy
E-3	Jenbacher JGC 620	8.3 tpy	6.1 tpy	2.5 tpy	0.3 tpy	1.2 tpy	1.2 tpy	12,706.6 tpy	144.39 tpy	0.027 tpy	16,324 tpy	1.9 tpy	3.2 tpy	0.5 tpy	0.3 tpy	0.1 tpy	0.1 tpy
E-4	Jenbacher JGC 620	8.3 tpy	6.1 tpy	2.5 tpy	0.3 tpy	1.2 tpy	1.2 tpy	12,706.6 tpy	144.39 tpy	0.027 tpy	16,324 tpy	1.9 tpy	3.2 tpy	0.5 tpy	0.3 tpy	0.1 tpy	0.1 tpy
E-5	Jenbacher JGC 620	8.3 tpy	6.1 tpy	2.5 tpy	0.3 tpy	1.2 tpy	1.2 tpy	12,706.6 tpy	144.39 tpy	0.027 tpy	16,324 tpy	1.9 tpy	3.2 tpy	0.5 tpy	0.3 tpy	0.1 tpy	0.1 tpy
E-6	Jenbacher JGC 620	8.3 tpy	6.1 tpy	2.5 tpy	0.3 tpy	1.2 tpy	1.2 tpy	12,706.6 tpy	144.39 tpy	0.027 tpy	16,324 tpy	1.9 tpy	3.2 tpy	0.5 tpy	0.3 tpy	0.1 tpy	0.1 tpy
E-7	Jenbacher JGC 624	10.9 tpy	7.9 tpy	3.2 tpy	0.3 tpy	1.5 tpy	1.5 tpy	16,281.5 tpy	185.02 tpy	0.034 tpy	20,917 tpy	2.1 tpy	2.2 tpy	0.6 tpy	0.4 tpy	0.1 tpy	0.2 tpy
E-8	Jenbacher JGC 624	10.9 tpy	7.9 tpy	3.2 tpy	0.3 tpy	1.5 tpy	1.5 tpy	16,281.5 tpy	185.02 tpy	0.034 tpy	20,917 tpy	2.1 tpy	2.2 tpy	0.6 tpy	0.4 tpy	0.1 tpy	0.2 tpy
E-9	Jenbacher JGC 624	10.9 tpy	7.9 tpy	3.2 tpy	0.3 tpy	1.5 tpy	1.5 tpy	16,281.5 tpy	185.02 tpy	0.034 tpy	20,917 tpy	2.1 tpy	2.2 tpy	0.6 tpy	0.4 tpy	0.1 tpy	0.2 tpy
E-10	Jenbacher JGC 624	10.9 tpy	7.9 tpy	3.2 tpy	0.3 tpy	1.5 tpy	1.5 tpy	16,281.5 tpy	185.02 tpy	0.034 tpy	20,917 tpy	2.1 tpy	2.2 tpy	0.6 tpy	0.4 tpy	0.1 tpy	0.2 tpy
E-11	Jenbacher JGC 624	10.9 tpy	7.9 tpy	3.2 tpy	0.3 tpy	1.5 tpy	1.5 tpy	16,281.5 tpy	185.02 tpy	0.034 tpy	20,917 tpy	2.1 tpy	2.2 tpy	0.6 tpy	0.4 tpy	0.1 tpy	0.2 tpy
E-12	Jenbacher JGC 624	10.9 tpy	7.9 tpy	3.2 tpy	0.3 tpy	1.5 tpy	1.5 tpy	16,281.5 tpy	185.02 tpy	0.034 tpy	20,917 tpy	2.1 tpy	2.2 tpy	0.6 tpy	0.4 tpy	0.1 tpy	0.2 tpy
E-13	Jenbacher JGC 624	10.9 tpy	7.9 tpy	3.2 tpy	0.3 tpy	1.5 tpy	1.5 tpy	16,281.5 tpy	185.02 tpy	0.034 tpy	20,917 tpy	2.1 tpy	2.2 tpy	0.6 tpy	0.4 tpy	0.1 tpy	0.2 tpy
E-14	Truck Loading	10.9 tpy	7.9 tpy	3.2 tpy	0.3 tpy	1.5 tpy	1.5 tpy	16,281.5 tpy	185.02 tpy	0.034 tpy	20,917 tpy	2.1 tpy	2.2 tpy	0.6 tpy	0.4 tpy	0.1 tpy	0.2 tpy
E-15	Jenbacher JGC 624	10.9 tpy	7.9 tpy	3.2 tpy	0.3 tpy	1.5 tpy	1.5 tpy	16,281.5 tpy	185.02 tpy	0.034 tpy	20,917 tpy	2.1 tpy	2.2 tpy	0.6 tpy	0.4 tpy	0.1 tpy	0.2 tpy
E-16	Jenbacher JGC 624	10.9 tpy	7.9 tpy	3.2 tpy	0.3 tpy	1.5 tpy	1.5 tpy	16,281.5 tpy	185.02 tpy	0.034 tpy	20,917 tpy	2.1 tpy	2.2 tpy	0.6 tpy	0.4 tpy	0.1 tpy	0.2 tpy
TK-1	Lube oil tank	--	--	0.0 tpy	--	--	--	--	--	--	--	--	--	--	--	--	--
TK-2	Lube oil tank	--	--	0.0 tpy	--	--	--	--	--	--	--	--	--	--	--	--	--
Fug	Fugitive Equipment Leaks	--	--	0.0 tpy	--	--	--	0.1 tpy	29.91 tpy	0.000 tpy	748 tpy	--	--	--	--	--	--
Dust	Access Road Emissions	--	--	--	--	0.3 tpy	0.0 tpy	--	--	--	--	--	--	--	--	--	--
Facility Totals		159.0 tpy	115.9 tpy	46.6 tpy	4.8 tpy	22.0 tpy	21.7 tpy	239,054.8 tpy	2,746.45 tpy	0.500 tpy	307,865 tpy	32.1 tpy	41.6 tpy	9.1 tpy	5.6 tpy	1.2 tpy	2.7 tpy

Westside Station
Saddle Butte Energy Farmington, LLC
Jenbacher JGC 620 Emissions

Engine Data			
IC Engine Make	Jenbacher	Lower Heating Value	1,008 Btu/scf
IC Engine Model	JGC 620	Sulfur Content	7,500 gr/MMscf
Power Rating	4,183 bhp	Fuel Consumption	26,168 scf/hr
Brake-Specific Fuel Consumption	6,305 Btu/bhp-hr	Fuel Consumption	229.23 MMscf/yr
Duty (input)	26.37 MMBtu/hr	Combustion Type	4-Stroke Lean Burn
Op. hours per engine	8,760 hr/yr		

Pollutant	Uncontrolled Emission Factors	Uncontrolled Emissions		Source of Emission Factors
		lb/hr	TPY	
NO _x	1.02 g/hp-hr	9.42	41.28	Manufacture Specs.
CO	2.17 g/hp-hr	19.98	87.51	Manufacture Specs.
VOC	0.12 g/hp-hr	1.13	4.95	Manufacture Specs.
SO ₂	0.00221 lb/MMBtu	0.058	0.255	100% Conversion of Sulfur
PM ₁₀	0.00999 lb/MMBtu	0.26	1.15	AP42 Tbl 3.2-2
PM _{2.5}	0.00999 lb/MMBtu	0.26	1.15	AP42 Tbl 3.2-2

Pollutant	Controlled Emission Factors	Controlled		Control Efficiency	Source of Emission Factors
		lb/hr	TPY		
NO _x	0.204 g/hp-hr	1.88	8.26	80.0%	Catalyst Specs
CO	0.152 g/hp-hr	1.40	6.13	93.0%	Catalyst Specs
VOC	0.061 g/hp-hr	0.57	2.48	50.0%	Catalyst Specs
SO ₂	0.00221 lb/MMBtu	0.058	0.255	0%	100% Conversion of Sulfur
PM ₁₀	0.00999 lb/MMBtu	0.263	1.154	0%	AP42 Tbl 3.2-2
PM _{2.5}	0.00999 lb/MMBtu	0.263	1.154	0%	AP42 Tbl 3.2-2

Sample Calcs:

(bhp) (Btu/bhp-hr) (MM/10⁶) = MMBtu/hr; (MMBtu/hr) / (Btu/scf) (10⁶/MM) = scf/hr

(g/hp-hr) (bhp) (lb/453.59 g) = lb/hr; (lb/MMBtu) (MMBtu/hr) = lb/hr; (lb/hr) (100 - % control) / 100 = lb/hr

(lb/hr) (hrs/yr) (ton/2000 lb) = tons/yr; (tpy) (100 - % control) / 100 = tpy

Notes:

Horsepower, and fuel consumption from Manufacturer spec sheet

Uncontrolled NOX, CO and VOC emission factors based on Manufacturer data converted from concentration based emissions

Emissions based on AP42 Chapter 3.2-2, Sox emissions based on 100% conversion of sulfur to SO₂ at 2000 grains/MMscf.

Emission factor for PM10 & PM2.5 from EPA, AP-42 Chapter 3.2, Table 3.2-2, including PM10/PM2.5 filterable & PM condensable

Westside Station
Saddle Butte Energy Farmington, LLC
Jenbacher JGC 620 Emissions

Engine Data			
IC Engine Make	Jenbacher	Lower Heating Value	1,008 Btu/scf
IC Engine Model	JGC 620	Sulfur Content	7,500 gr/MMscf
Power Rating	4,183 bhp	Fuel Consumption	26,168 scf/hr
Brake-Specific Fuel Consumption	6,305 Btu/bhp-hr	Fuel Consumption	229.23 MMscf/yr
Duty (input)	26.37 MMBtu/hr	Combustion Type	4-Stroke Lean Burn
Op. hours per engine	8,760 hr/yr		

Pollutant	Emission Factor ¹	Uncontrolled Emission Rates			Controlled Emission Rates		
		One Engine			One Engine		
		(lb/hr) ²	(lbs/yr)	(tpy) ³	(lb/hr) ²	(lbs/yr)	(tpy) ³
Ammonia ⁴	0.05 g/bhp-hr	0.4388	3,844.24	1.9222	0.4388	3,844.24	1.9222
1,1,2,2-Tetrachloroethane	4.00E-05 lb/MMBtu	0.0011	9.24	0.0047	0.0005	4.62	0.0024
1,1,2-Trichloroethane	3.18E-05 lb/MMBtu	0.0008	7.35	0.0037	0.0004	3.67	0.0019
1,3-Butadiene	2.67E-04 lb/MMBtu	0.0070	61.68	0.0309	0.0035	30.84	0.0155
1,3-Dichloropropene	2.64E-05 lb/MMBtu	0.0007	6.10	0.0031	0.0003	3.05	0.0016
2-Methylnaphthalene	3.32E-05 lb/MMBtu	0.0009	7.67	0.0039	0.0004	3.84	0.0020
2,2,4-Trimethylpentane	2.50E-04 lb/MMBtu	0.0066	57.76	0.0289	0.0033	28.88	0.0145
Acenaphthene	1.25E-06 lb/MMBtu	0.0000	0.29	0.0002	0.0000	0.14	0.0001
Acenaphthylene	5.53E-06 lb/MMBtu	0.0001	1.28	0.0007	0.0001	0.64	0.0004
Acetaldehyde	8.36E-03 lb/MMBtu	0.2205	1,931.40	0.9658	0.1102	965.70	0.4829
Acrolein	5.14E-03 lb/MMBtu	0.1356	1,187.49	0.5938	0.0678	593.75	0.2969
Benzene	4.40E-04 lb/MMBtu	0.0116	101.65	0.0509	0.0058	50.83	0.0255
Benzo(b)fluoranthene	1.66E-07 lb/MMBtu	0.0000	0.04	0.0001	0.0000	0.02	0.0001
Benzo(e)pyrene	4.15E-07 lb/MMBtu	0.0000	0.10	0.0001	0.0000	0.05	0.0001
Benzo(g,h,i)perylene	4.14E-07 lb/MMBtu	0.0000	0.10	0.0001	0.0000	0.05	0.0001
Benzo(k)fluoranthene	--	--	--	--	--	--	--
Biphenyl	2.12E-04 lb/MMBtu	0.0056	48.98	0.0245	0.0028	24.49	0.0123
Carbon Tetrachloride	3.67E-05 lb/MMBtu	0.0010	8.48	0.0043	0.0005	4.24	0.0022
Chlorobenzene	3.04E-05 lb/MMBtu	0.0008	7.02	0.0036	0.0004	3.51	0.0018
Chloroform	2.85E-05 lb/MMBtu	0.0008	6.58	0.0033	0.0004	3.29	0.0017
Chrysene	6.93E-07 lb/MMBtu	0.0000	0.16	0.0001	0.0000	0.08	0.0001
Ethylbenzene	3.97E-05 lb/MMBtu	0.0010	9.17	0.0046	0.0005	4.59	0.0023
Ethylene Dibromide	4.43E-05 lb/MMBtu	0.0012	10.23	0.0052	0.0006	5.12	0.0026
Fluoranthene	1.10E-06 lb/MMBtu	0.0000	0.25	0.0002	0.0000	0.13	0.0001
Fluorene	5.67E-06 lb/MMBtu	0.0001	1.31	0.0007	0.0001	0.65	0.0004
Formaldehyde	0.27 g/bhp-hr	2.4503	21,464.33	10.7400	0.7351	6,439.30	3.2200
Indeno(1,2,3-c,d)pyrene	--	--	--	--	--	--	--
Methanol	2.50E-03 lb/MMBtu	0.0659	577.57	0.2888	0.0330	288.79	0.1444
Methylene Chloride	2.00E-05 lb/MMBtu	0.0005	4.62	0.0024	0.0003	2.31	0.0012
n-Hexane	1.10E-03 lb/MMBtu	0.0290	254.13	0.1271	0.0145	127.07	0.0636
n-Nonane ⁴	1.10E-04 lb/MMBtu	0.0029	25.41	0.0128	0.0015	12.71	0.0064
n-Octane ⁴	3.51E-04 lb/MMBtu	0.0093	81.09	0.0406	0.0046	40.55	0.0203
Naphthalene	7.44E-05 lb/MMBtu	0.0020	17.19	0.0086	0.0010	8.59	0.0043
PAH	2.69E-05 lb/MMBtu	0.0007	6.21	0.0032	0.0004	3.11	0.0016
Phenanthrene	1.04E-05 lb/MMBtu	0.0003	2.40	0.0013	0.0001	1.20	0.0007
Phenol	2.40E-05 lb/MMBtu	0.0006	5.54	0.0028	0.0003	2.77	0.0014
Pyrene	1.36E-06 lb/MMBtu	0.0000	0.31	0.0002	0.0000	0.16	0.0001
Styrene	2.36E-05 lb/MMBtu	0.0006	5.45	0.0028	0.0003	2.73	0.0014
Tetrachloroethane	2.48E-06 lb/MMBtu	0.0001	0.57	0.0003	0.0000	0.29	0.0002
Toluene	4.08E-04 lb/MMBtu	0.0108	94.26	0.0472	0.0054	47.13	0.0236
Vinyl Chloride	1.49E-05 lb/MMBtu	0.0004	3.44	0.0018	0.0002	1.72	0.0009
Xylene	1.84E-04 lb/MMBtu	0.0049	42.51	0.0213	0.0024	21.25	0.0107
		Total			1.4	12,576.1	6.29
		Total Federal HAP			0.99	8,678.6	4.34
		Maximum Individual HAP (HCHO)					3.22

Hours of Operation	8,760 hr/yr	Heat Input (HHV)	26.37 MMBtu/hr
Horsepower	4,183 bhp	Catalyst CE for HCHO ⁵	70%
Specific Fuel Consumption	6,305 Btu/bhp-hr	CE for Other HAPs	50%

Notes:

- Emission factors from EPA, AP-42 Chapter 3.2, Table 3.2-2
- (MMBtu/hr [HHV]) (lb/MMBtu) = lb/hr; (lb/hr) (100 - % control) / 100 = lb/hr
(g/bhp-hr) (bhp) (lb/453.59 g) = lb/hr; (lb/hr) (100 - % control) / 100 = lb/hr
- (lb/hr) (8760 hr/yr) / (2,000 lb/ton) = tpy; (tpy) (100 - % control) / 100 = tpy
- Substance is not a Federal HAP but are listed as a Toxic Air Pollutant under 20.2.72.502
- Catalyst control efficiency based on manufacturer-specified percent reduction
- Heat input rate for the engine is based on fuel consumption rate (Btu/bhp-hr) for the engine from manufacturer spec sheet.
[Btu/bhp-hr] * [bhp] / 1,000,000 = MMBtu/hr

Westside Station
Saddle Butte Energy Farmington, LLC
Jenbacher JGC 620 Emission Factor Conversions

Inputs

<i>Factor</i>	<i>Value</i>	<i>Units</i>	<i>Source</i>
<i>Nox Concentration dry basis (Cd)</i>	500	mg/Nm3	Manufacturer
	3.12E-05	lb/scf	Manufacturer
<i>CO Concentration dry basis (Cd)</i>	1060	mg/Nm3	Manufacturer
	6.62E-05	lb/scf	Manufacturer
<i>VOC Concentration dry basis (Cd)</i>	60	mg/Nm3	Manufacturer
	3.75E-06	lb/scf	Manufacturer
<i>Ammonia Concentration dry basis (Cd)</i>	12	ppmvd	Manufacturer
	5.39E-07	lb/scf	Manufacturer
<i>Formaldehyde Concentration dry basis (Cd)</i>	130	mg/Nm3	Manufacturer
	8.11E-06	lb/scf	Manufacturer
<i>Oxygen Concentration dry Basis Ammonia (%O2d)</i>	15	%	Manufacturer
<i>Oxygen Concentration dry Basis All Others (%O2d)</i>	5	%	Manufacturer
<i>Natural Gas Volume of combustion dry basis (Fd)</i>	8710	scf/MMBtu	EPA Method 19 Table 19-2
<i>Engine Specific fuel consumption</i>	6305	Btu/hp-hr	Manufacturer
<i>Conversion Factors</i>	1.60E+13	lb/scf to ng/scm	EPA Method 19 Table 19-1
	1.00E+06	mg/scm to ng/scm	

Outputs

Nox emission factors	3.57E-01	lb/MMBtu	EPA Method 19 Equation 19-1
	1.022	g/hp-hr	
CO emission factors	7.58E-01	lb/MMBtu	EPA Method 19 Equation 19-1
	2.167	g/hp-hr	
VOC emission factors	4.29E-02	lb/MMBtu	EPA Method 19 Equation 19-1
	0.123	g/hp-hr	
Formaldehyde emission factors	9.29E-02	lb/MMBtu	EPA Method 19 Equation 19-1
	0.266	g/hp-hr	
Ammonia emission factors	1.66E-02	lb/MMBtu	EPA Method 19 Equation 19-2
	0.048	g/hp-hr	

Westside Station
Saddle Butte Energy Farmington, LLC
Jenbacher JGC 624 Emission Calculations

Engine Data			
IC Engine Make	Jenbacher	Lower Heating Value	1,008 Btu/scf
IC Engine Model	JGC 624	Sulfur Content	7,500 gr/MMscf
Power Rating	6,161 bhp	Fuel Consumption	33,530 scf/hr
Brake-Specific Fuel Consumption	5,485 Btu/bhp-hr	Fuel Consumption	293.726 MMscf/yr
Duty (input)	33.793 MMBtu/hr	Combustion Type	4-Stroke Lean Burn
Op. hours per engine	8,760 hr/yr		

Pollutant	Uncontrolled Emission Factors	Uncontrolled Emissions		Source of Emission Factors
		lb/hr	TPY	
NO _x	0.92 g/hp-hr	12.50	54.73	Manufacture Specs.
CO	1.90 g/hp-hr	25.81	113.04	Manufacture Specs.
VOC	0.11 g/hp-hr	1.45	6.35	Manufacture Specs.
SO ₂	0.00221 lb/MMBtu	0.075	0.326	100% Conversion of Sulfur
PM ₁₀	0.00999 lb/MMBtu	0.34	1.48	AP42 Tbl 3.2-2
PM _{2.5}	0.00999 lb/MMBtu	0.34	1.48	AP42 Tbl 3.2-2

Pollutant	Controlled Emission Factors	Controlled		Control Efficiency	Source of Emission Factors
		lb/hr	TPY		
NO _x	0.184 g/hp-hr	2.50	10.95	80.0%	Catalyst Specs
CO	0.133 g/hp-hr	1.81	7.91	93.0%	Catalyst Specs
VOC	0.053 g/hp-hr	0.73	3.18	50.0%	Catalyst Specs
SO ₂	0.00221 lb/MMBtu	0.075	0.326	0%	100% Conversion of Sulfur
PM ₁₀	0.00999 lb/MMBtu	0.337	1.478	0%	AP42 Tbl 3.2-2
PM _{2.5}	0.00999 lb/MMBtu	0.337	1.478	0%	AP42 Tbl 3.2-2

Sample Calcs:

(bhp) (Btu/bhp-hr) (MM/10⁶) = MMBtu/hr; (MMBtu/hr) / (Btu/scf) (10⁶/MM) = scf/hr

(g/hp-hr) (bhp) (lb/453.59 g) = lb/hr; (lb/MMBtu) (MMBtu/hr) = lb/hr; (lb/hr) (100 - % control) / 100 = lb/hr

(lb/hr) (hrs/yr) (ton/2000 lb) = tons/yr; (tpy) (100 - % control) / 100 = tpy

Notes:

Horsepower, and fuel consumption from Manufacturer spec sheet

Uncontrolled NO_x, CO and VOC emission factors based on Manufacturer data. VOC emission factor converted from concentration basis

Emissions based on AP42 Chapter 3.2-2, Sox emissions based on 100% conversion of sulfur to SO₂ at 2000 grains/MMscf.

Emission factor for PM₁₀ & PM_{2.5} from EPA, AP-42 Chapter 3.2, Table 3.2-2, including PM₁₀/PM_{2.5} filterable & PM condensable

Westside Station
Saddle Butte Energy Farmington, LLC
Jenbacher JGC 624 Emission Calculations

Engine Data			
IC Engine Make	Jenbacher	Lower Heating Value	1,008 Btu/scf
IC Engine Model	JGC 624	Sulfur Content	7,500 gr/MMscf
Power Rating	6,161 bhp	Fuel Consumption	33,530 scf/hr
Brake-Specific Fuel Consumption	5,485 Btu/bhp-hr	Fuel Consumption	293.726 MMscf/yr
Duty (input)	33.793 MMBtu/hr	Combustion Type	4-Stroke Lean Burn
Op. hours per engine	8,760 hr/yr		

Pollutant	Emission Factor ¹	Uncontrolled Emission Rates			Controlled Emission Rates		
		One Engine			One Engine		
		(lb/hr) ²	(lbs/yr)	(tpy) ³	(lb/hr) ²	(lbs/yr)	(tpy) ³
Ammonia ⁴	0.03 g/bhp-hr	0.4686	4,104.82	2.0525	0.4686	4,104.82	2.0525
1,1,2,2-Tetrachloroethane	4.00E-05 lb/MMBtu	0.0014	11.84	0.0060	0.0007	5.92	0.0030
1,1,2-Trichloroethane	3.18E-05 lb/MMBtu	0.0011	9.41	0.0048	0.0005	4.71	0.0024
1,3-Butadiene	2.67E-04 lb/MMBtu	0.0090	79.04	0.0396	0.0045	39.52	0.0198
1,3-Dichloropropene	2.64E-05 lb/MMBtu	0.0009	7.82	0.0040	0.0004	3.91	0.0020
2-Methylnaphthalene	3.32E-05 lb/MMBtu	0.0011	9.83	0.0050	0.0006	4.91	0.0025
2,2,4-Trimethylpentane	2.50E-04 lb/MMBtu	0.0084	74.01	0.0371	0.0042	37.00	0.0186
Acenaphthene	1.25E-06 lb/MMBtu	0.0000	0.37	0.0002	0.0000	0.19	0.0001
Acenaphthylene	5.53E-06 lb/MMBtu	0.0002	1.64	0.0009	0.0001	0.82	0.0005
Acetaldehyde	8.36E-03 lb/MMBtu	0.2825	2,474.79	1.2374	0.1413	1,237.39	0.6187
Acrolein	5.14E-03 lb/MMBtu	0.1737	1,521.58	0.7608	0.0868	760.79	0.3804
Benzene	4.40E-04 lb/MMBtu	0.0149	130.25	0.0652	0.0074	65.13	0.0326
Benzo(b)fluoranthene	1.66E-07 lb/MMBtu	0.0000	0.05	0.0001	0.0000	0.02	0.0001
Benzo(e)pyrene	4.15E-07 lb/MMBtu	0.0000	0.12	0.0001	0.0000	0.06	0.0001
Benzo(g,h,i)perylene	4.14E-07 lb/MMBtu	0.0000	0.12	0.0001	0.0000	0.06	0.0001
Benzo(k)fluoranthene	--	--	--	--	--	--	--
Biphenyl	2.12E-04 lb/MMBtu	0.0072	62.76	0.0314	0.0036	31.38	0.0157
Carbon Tetrachloride	3.67E-05 lb/MMBtu	0.0012	10.86	0.0055	0.0006	5.43	0.0028
Chlorobenzene	3.04E-05 lb/MMBtu	0.0010	9.00	0.0045	0.0005	4.50	0.0023
Chloroform	2.85E-05 lb/MMBtu	0.0010	8.44	0.0043	0.0005	4.22	0.0022
Chrysene	6.93E-07 lb/MMBtu	0.0000	0.21	0.0002	0.0000	0.10	0.0001
Ethylbenzene	3.97E-05 lb/MMBtu	0.0013	11.75	0.0059	0.0007	5.88	0.0030
Ethylene Dibromide	4.43E-05 lb/MMBtu	0.0015	13.11	0.0066	0.0007	6.56	0.0033
Fluoranthene	1.10E-06 lb/MMBtu	0.0000	0.33	0.0002	0.0000	0.16	0.0001
Fluorene	5.67E-06 lb/MMBtu	0.0002	1.68	0.0009	0.0001	0.84	0.0005
Formaldehyde	0.12 g/bhp-hr	1.6921	14,822.70	7.4200	0.5076	4,446.81	2.2300
Indeno(1,2,3-c,d)pyrene	--	--	--	--	--	--	--
Methanol	2.50E-03 lb/MMBtu	0.0845	740.07	0.3701	0.0422	370.03	0.1851
Methylene Chloride	2.00E-05 lb/MMBtu	0.0007	5.92	0.0030	0.0003	2.96	0.0015
n-Hexane	1.10E-03 lb/MMBtu	0.0372	325.63	0.1629	0.0186	162.82	0.0815
n-Nonane ⁴	1.10E-04 lb/MMBtu	0.0037	32.56	0.0163	0.0019	16.28	0.0082
n-Octane ⁴	3.51E-04 lb/MMBtu	0.0119	103.91	0.0520	0.0059	51.95	0.0260
Naphthalene	7.44E-05 lb/MMBtu	0.0025	22.02	0.0111	0.0013	11.01	0.0056
PAH	2.69E-05 lb/MMBtu	0.0009	7.96	0.0040	0.0005	3.98	0.0020
Phenanthrene	1.04E-05 lb/MMBtu	0.0004	3.08	0.0016	0.0002	1.54	0.0008
Phenol	2.40E-05 lb/MMBtu	0.0008	7.10	0.0036	0.0004	3.55	0.0018
Pyrene	1.36E-06 lb/MMBtu	0.0000	0.40	0.0003	0.0000	0.20	0.0002
Styrene	2.36E-05 lb/MMBtu	0.0008	6.99	0.0035	0.0004	3.49	0.0018
Tetrachloroethane	2.48E-06 lb/MMBtu	0.0001	0.73	0.0004	0.0000	0.37	0.0002
Toluene	4.08E-04 lb/MMBtu	0.0138	120.78	0.0604	0.0069	60.39	0.0302
Vinyl Chloride	1.49E-05 lb/MMBtu	0.0005	4.41	0.0023	0.0003	2.21	0.0012
Xylene	1.84E-04 lb/MMBtu	0.0062	54.47	0.0273	0.0031	27.23	0.0137
		Total			1.3	11,489.1	5.75
		Total Federal HAP			0.84	7,316.1	3.67
		Maximum Individual HAP (HCHO)					2.23

Hours of Operation	8,760 hr/yr	Heat Input (HHV)	33.79 MMBtu/hr
Horsepower	6,161 bhp	Catalyst CE for HCHO ⁵	70%
Specific Fuel Consumption	5,485 Btu/bhp-hr	CE for Other HAPs	50%

Notes:

- Emission factors from EPA, AP-42 Chapter 3.2, Table 3.2-2
- (MMBtu/hr [HHV]) (lb/MMBtu) = lb/hr; (lb/hr) (100 - % control) / 100 = lb/hr
(g/hp-hr) (bhp) (lb/453.59 g) = lb/hr; (lb/hr) (100 - % control) / 100 = lb/hr
- (lb/hr) (8760 hr/yr) / (2,000 lb/ton) = tpy; (tpy) (100 - % control) / 100 = tpy
- Substance is not a Federal HAP but are listed as a Toxic Air Pollutant under 20.2.72.502
- Catalyst control efficiency based on manufacturer-specified percent reduction
- Heat input rate for the engine is based on fuel consumption rate (Btu/bhp-hr) for the engine from manufacturer spec sheet.
[lb/bhp-hr] * [bhp] / 1,000,000 = MMBtu/hr

Westside Station
Saddle Butte Energy Farmington, LLC
Jenbacher JGC 624 Emission Factor Conversions

Inputs

<i>Factor</i>	<i>Value</i>	<i>Units</i>	<i>Source</i>
VOC Concentration dry basis (Cd)	60	mg/Nm3	Manufacturer
	3.7453E-06	lb/scf	Manufacturer
Ammonia Concentration dry basis (Cd)	10	ppmvd	Manufacturer
	4.4901E-07	lb/scf	Manufacturer
Formaldehyde Concentration dry basis (Cd)	70	mg/Nm3	Manufacturer
	4.3695E-06	lb/scf	Manufacturer
Oxygen Concentration dry Basis Ammonia (%O2d)	15	%	Manufacturer
Oxygen Concentration dry Basis All Others (%O2d)	5	%	Manufacturer
Natural Gas Volume of combustion dry basis (Fd)	8710	scf/MMBtu	EPA Method 19 Table 19-2
Engine Specific fuel consumption	5485	Btu/hp-hr	Manufacturer
Conversion Factors	1.602E+13	lb/scf to ng/scm	EPA Method 19 Table 19-1
	1.000E+06	mg/scm to ng/scm	

Outputs

VOC emission factors	4.2880E-02	lb/MMBtu	EPA Method 19 Equation 19-1
	0.1068	g/hp-hr	
Formaldehyde emission factors	5.0027E-02	lb/MMBtu	EPA Method 19 Equation 19-1
	0.1246	g/hp-hr	
Ammonia emission factors	1.3854E-02	lb/MMBtu	EPA Method 19 Equation 19-2
	0.0345	g/hp-hr	

Westside Station
Saddle Butte Energy Farmington, LLC
Access Road Emissions

Input data

Surface Material Silt Content	8.5 %	(Based on average for construction sites)
Mean Vehicle Weight	3 tons	(Assume F150 or similar)
One way travel miles	0.25 miles	(from Map)
Round trips per day	0.5	(facility is visited every other day)

Contants	PM2.5	PM-10	PM-30
k	0.15	1.5	4.9
a	0.9	0.9	0.7
b	0.45	0.45	0.45

Emission rates	Emission Factor (lb/VMT)	lb/hr	tons/yr
PM-2.5	0.1100	0.03	0.03
PM-10	1.0998	0.27	0.27
PM	3.8491	0.96	0.96

Westside Station
Saddle Butte Energy Farmington, LLC
Fugitive Emissions

Input data

Emission Factor	166	scf/hr/station	(40 CFR 98 Table W-5 for Transmission Company Interconnect M&R Station)
Conversion Factor	379.49	scf/lb-mole	
Gas MW	16.38	lb/lb-mole	(Gas Analysis)
Operating hours	8760.00	hrs/yr	

Emission rates	Gas Composition Wt%	lb/hr	tons/yr
VOC	0.0507%	0.00	0.02
CO2	0.1994%	0.01	0.06
Methane	95.3297%	6.83	29.91

See Digital files for Lube oil tank emission calculations from TANKS 5.1

Section 6.a

Green House Gas Emissions

(Submitting under 20.2.70, 20.2.72 20.2.74 NMAC)

Title V (20.2.70 NMAC), Minor NSR (20.2.72 NMAC), and PSD (20.2.74 NMAC) applicants must estimate and report greenhouse gas (GHG) emissions to verify the emission rates reported in the public notice, determine applicability to 40 CFR 60 Subparts, and to evaluate Prevention of Significant Deterioration (PSD) applicability. GHG emissions that are subject to air permit regulations consist of the sum of an aggregate group of these six greenhouse gases: carbon dioxide (CO₂), nitrous oxide (N₂O), methane (CH₄), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆).

Calculating GHG Emissions:

1. Calculate the ton per year (tpy) GHG mass emissions and GHG CO₂e emissions from your facility.
2. GHG mass emissions are the sum of the total annual tons of greenhouse gases without adjusting with the global warming potentials (GWPs). GHG CO₂e emissions are the sum of the mass emissions of each individual GHG multiplied by its GWP found in Table A-1 in 40 CFR 98 Mandatory Greenhouse Gas Reporting.
3. Emissions from routine or predictable start up, shut down, and maintenance must be included.
4. Report GHG mass and GHG CO₂e emissions in Table 2-P of this application. Emissions are reported in **short** tons per year and represent each emission unit's Potential to Emit (PTE).
5. All Title V major sources, PSD major sources, and all power plants, whether major or not, must calculate and report GHG mass and CO₂e emissions for each unit in Table 2-P.
6. For minor source facilities that are not power plants, are not Title V, and are not PSD there are three options for reporting GHGs in Table 2-P: 1) report GHGs for each individual piece of equipment; 2) report all GHGs from a group of unit types, for example report all combustion source GHGs as a single unit and all venting GHGs as a second separate unit; 3) or check the following ☐ By checking this box, the applicant acknowledges the total CO₂e emissions are less than 75,000 tons per year.

Sources for Calculating GHG Emissions:

- Manufacturer's Data
- AP-42 Compilation of Air Pollutant Emission Factors at <http://www.epa.gov/ttn/chief/ap42/index.html>
- EPA's Internet emission factor database WebFIRE at <http://cfpub.epa.gov/webfire/>
- 40 CFR 98 Mandatory Green House Gas Reporting except that tons should be reported in short tons rather than in metric tons for the purpose of PSD applicability.
- API Compendium of Greenhouse Gas Emissions Methodologies for the Oil and Natural Gas Industry. August 2009 or most recent version.
- Sources listed on EPA's NSR Resources for Estimating GHG Emissions at <http://www.epa.gov/nsr/clean-air-act-permitting-greenhouse-gases>:

Global Warming Potentials (GWP):

Applicants must use the Global Warming Potentials codified in Table A-1 of the most recent version of 40 CFR 98 Mandatory Greenhouse Gas Reporting. The GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to that of one unit mass of CO₂ over a specified time period.

"Greenhouse gas" for the purpose of air permit regulations is defined as the aggregate group of the following six gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. **(20.2.70.7 NMAC, 20.2.74.7 NMAC)**. You may also find GHGs defined in 40 CFR 86.1818-12(a).

Metric to Short Ton Conversion:

Short tons for GHGs and other regulated pollutants are the standard unit of measure for PSD and title V permitting programs. 40 CFR 98 Mandatory Greenhouse Reporting requires metric tons.

1 metric ton = 1.10231 short tons (per Table A-2 to Subpart A of Part 98 – Units of Measure Conversions)

Westside Station
Saddle Butte Energy Farmington, LLC
Jenbacher JGC 620 Emissions

Engine Data			
IC Engine Make	Jenbacher	Lower Heating Value	1,008 Btu/scf
IC Engine Model	JGC 620	Sulfur Content	7,500 gr/MMscf
Power Rating	4,183 bhp	Fuel Consumption	26,168 scf/hr
Brake-Specific Fuel Consumption	6,305 Btu/bhp-hr	Fuel Consumption	229.23 MMscf/yr
Duty (input)	26.37 MMBtu/hr	Combustion Type	4-Stroke Lean Burn
Op. hours per engine	8,760 hr/yr		

Pollutant	Uncontrolled Emission Factors	Uncontrolled		Source of Emission Factors
		lb/hr	TPY	
CO2	110.00 lb/MMBtu	2,901.05	12,706.61	40 CFR Part 98 Table C-1
Methane	1.25 lb/MMBtu	32.97	144.39	40 CFR Part 98 Table W-7
N2O	0.0002 lb/MMBtu	0.01	0.03	40 CFR Part 98 Table C-2

Westside Station
Saddle Butte Energy Farmington, LLC
Jenbacher JGC 624 Emission Calculations

Engine Data			
IC Engine Make	Jenbacher	Lower Heating Value	1,008 Btu/scf
IC Engine Model	JGC 624	Sulfur Content	7,500 gr/MMscf
Power Rating	6,161 bhp	Fuel Consumption	33,530 scf/hr
Brake-Specific Fuel Consumption	5,485 Btu/bhp-hr	Fuel Consumption	293.726 MMscf/yr
Duty (input)	33.793 MMBtu/hr	Combustion Type	4-Stroke Lean Burn
Op. hours per engine	8,760 hr/yr		

Pollutant	Uncontrolled Emission Factors	Uncontrolled		Source of Emission Factors
		lb/hr	TPY	
CO2	110.00 lb/MMBtu	3,717.24	16,281.51	40 CFR Part 98 Table C-1
Methane	1.25 lb/MMBtu	42.24	185.02	40 CFR Part 98 Table W-7
N2O	0.0002 lb/MMBtu	0.01	0.03	40 CFR Part 98 Table C-2

Westside Station
Saddle Butte Energy Farmington, LLC
Fugitive Emissions

Input data

Emission Factor	166	scf/hr/station	(40 CFR 98 Table W-5 for Transmission Company Interconnect M&R Station)
Conversion Factor	379.49	scf/lb-mole	
Gas MW	16.38	lb/lb-mole	(Gas Analysis)
Operating hours	8760.00	hrs/yr	

Emission rates	Gas Composition Wt%	lb/hr	tons/yr
VOC	0.0507%	0.00	0.02
CO2	0.1994%	0.01	0.06
Methane	95.3297%	6.83	29.91

Section 7

Information Used To Determine Emissions

Information Used to Determine Emissions shall include the following:

- ☒ If manufacturer data are used, include specifications for emissions units and control equipment, including control efficiencies specifications and sufficient engineering data for verification of control equipment operation, including design drawings, test reports, and design parameters that affect normal operation.
 - ☐ If test data are used, include a copy of the complete test report. If the test data are for an emissions unit other than the one being permitted, the emission units must be identical. Test data may not be used if any difference in operating conditions of the unit being permitted and the unit represented in the test report significantly effect emission rates.
 - ☒ If the most current copy of AP-42 is used, reference the section and date located at the bottom of the page. Include a copy of the page containing the emissions factors, and clearly mark the factors used in the calculations.
 - ☐ If an older version of AP-42 is used, include a complete copy of the section.
 - ☐ If an EPA document or other material is referenced, include a complete copy.
 - ☒ Fuel specifications sheet.
 - ☒ If computer models are used to estimate emissions, include an input summary (if available) and a detailed report, and a disk containing the input file(s) used to run the model. For tank-flashing emissions, include a discussion of the method used to estimate tank-flashing emissions, relative thresholds (i.e., permit or major source (NSPS, PSD or Title V)), accuracy of the model, the input and output from simulation models and software, all calculations, documentation of any assumptions used, descriptions of sampling methods and conditions, copies of any lab sample analysis.
-

J620 Raw Emissions

From Cole Dougherty <CDougherty@sbpipeline.com>

Date Wed 2025-08-27 8:41 AM

To James Van Horne <jvanhorne@slrconsulting.com>

Cc Trent Miller <TMiller@sbpipeline.com>

A typo was corrected.

Cole

From: Josh White <jwhite@energydynamics.biz>

Sent: Wednesday, August 27, 2025 8:39 AM

To: Cole Dougherty <CDougherty@sbpipeline.com>; Mike Ryan <mryan@energydynamics.biz>

Subject: RE: Gas Assay

Sorry, fixed a typo on the bottom, it should say formaldehyde on the exhaust system, not non-methane hydrocarbons

Fuel gas system		
Calorific value	<i>kWh/m3</i>	9.73
Fuel gas volume	<i>m3/h</i>	741

Power and degrees of efficiency for 3MW		
Mechanical power (Blocked ISO standard power ICFN according to ISO 3046)	<i>kW</i>	3119
Electric power output at cos phi = 1	<i>kW</i>	3000

Exhaust System		
Nitrogen oxides	<i>mg/m3</i>	500
Carbon monoxide	<i>mg/m3</i>	1060
VOC(as NMNEHC, expressed as C, at full load)	<i>mg/m3</i>	60
Formaldehyde	<i>mg/m3</i>	130

From: Cole Dougherty <CDougherty@sbpipeline.com>

Sent: Wednesday, August 27, 2025 10:28 AM

To: Josh White <jwhite@energydynamics.biz>; Mike Ryan <mryan@energydynamics.biz>

Subject: RE: Gas Assay

Thank you Josh

From: Josh White <jwhite@energydynamics.biz>

Sent: Wednesday, August 27, 2025 8:27 AM

Application & Performance Warranty Data

Project Information

Site Location:	CO
Project Name:	Farmington Westside Jenbacher 620
Application:	Prime Power
Number Of Engines:	6
Operating Hours per Year:	8760

Engine Specifications

Engine Manufacturer:	Jenbacher
Model Number:	J620 GS-E01
Rated Speed:	1800 RPM
Type of Fuel:	Natural Gas
Type of Lube Oil:	1 wt% sulfated ash or less
Lube Oil Consumption:	0.1 % Fuel Consumption
Number of Exhaust Manifolds:	1

Engine Cycle Data

Load	Speed	Power	Exhaust Flow	Exhaust Temp.	Fuel Cons.	NO _x	CO	NMNEHC	CH ₂ O	O ₂	H ₂ O
%		kW	Nm ³ /hr	° C		mg/Nm ³ @ 5% O ₂	mg/Nm ³ @ 5% O ₂	mg/Nm ³ @ 5% O ₂	mg/Nm ³ @ 5% O ₂	%	%
100	Rated	3,041	13,666	425		500	1,060	60	130	10	12.5

Emission Data (100% Load)

Emission	Raw Engine Emissions						Target Outlet Emissions						Calculated Reduction
	g/bhp-hr	ppmvd @ 15% O ₂	tons/yr	ppmvd	g/kW-hr	lb/MW-hr	g/bhp-hr	ppmvd @ 15% O ₂	tons/yr	ppmvd	g/kW-hr	lb/MW-hr	
NO _x *	1.01	91	39.84	167	1.357	2.99	0.2	18	7.97	33	0.271	0.6	80%
CO	2.44	360	96.25	664	3.278	7.23	0.17	25	6.74	47	0.229	0.51	93%
NMNEHC**	0.14	36	5.45	66	0.186	0.41	0.07	18	2.72	33	0.093	0.2	50%
CH ₂ O	0.3	41	11.8	76	0.402	0.89	0.07	10	2.87	18	0.098	0.22	75.6%
NH ₃							0.04	10	1.63	18	0.055	0.12	

* MW referenced as NO₂

** MW referenced as CH₄. Propane in the exhaust shall not exceed 15% by volume of the NMHC compounds in the exhaust, excluding aldehydes. The 15% (vol.) shall be established on a wet basis, reported on a methane molecular weight basis. The measurement of exhaust NMHC composition shall be based upon EPA method 320 (FTIR), and shall exclude formaldehyde.

Technical Description

Generator Set-Container

JGC 624 GS-N.L

Grid Parallel with Island Operation

JGC 624 K111, 13800V

The ratings in the specification are valid for full load operation at a site installation of 3280 ft (1000 m) and an engine air intake temperature of $T_1 < 113^\circ\text{F}$ (45°C). At $T_1 > 113^\circ\text{F}$ (45°C), an output deration of 0.67%/F (1.2%/C) will occur.

TSR 3223/3230



Electrical output	4478	kW el.
Thermal output	9513	MBTU/hr

Emission values
NOx < 1.1 g/bhp.hr (NO2)

0.01 Technical Data (on container)

			100%	75%	50%
Power input	[2]	MBTU/hr	33,789	26,233	18,242
Gas volume	*)	SCFH	33,554	26,051	18,115
Mechanical output	[1]	bhp	6,161	4,621	3,080
Electrical output	[4]	kW el.	4,478	3,340	2,203
Recoverable thermal output (calculated with Glykol 20%)					
~ Intercooler 1st stage	[9]	MBTU/hr	5,296	3,259	1,462
~ Lube oil (with gearbox)		MBTU/hr	1,690	1,549	1,347
~ Jacket water		MBTU/hr	2,527	2,268	1,901
~ Exhaust gas cooled to 697 °F		MBTU/hr	0	0	0
Total recoverable thermal output	[5]	MBTU/hr	9,513	7,076	4,710
Heat to be dissipated (calculated with Glykol 20%)					
~ Intercooler 2nd stage		MBTU/hr	947	659	379
~ Lube oil (with gearbox)		MBTU/hr	---	---	---
~ Surface heat	ca. [7]	MBTU/hr	942	~	~
Spec. fuel consumption of engine electric	[2]	BTU/kWel.hr	7,545	7,855	8,279
Spec. fuel consumption of engine	[2]	BTU/bhp.hr	5,485	5,677	5,922
Lube oil consumption	ca. [3]	gal/hr	0.29	~	~
Electrical efficiency			45.2%	43.4%	41.2%
Thermal efficiency			28.2%	27.0%	25.8%
Total efficiency	[6]		73.4%	70.4%	67.0%
Hot water circuit:					
Forward temperature		°F	207.0	194.4	182.3
Return temperature		°F	158.0	158.0	158.0
Hot water flow rate		GPM	412.3	412.3	412.3
Fuel gas LHV		BTU/scft	1007		

*) approximate value for pipework dimensioning

[] Explanations: see 0.10 - Technical parameters

All heat data is based on standard conditions according to attachment 0.10. Deviations from the standard conditions can result in a change of values within the heat balance and must be taken into consideration in the layout of the cooling circuit/equipment (intercooler; emergency cooling; ...).

21-Jun-22

Formaldehyde (CH₂O) Statement

INNIO Jenbacher Gas Engines has done a significant amount of research studying formaldehyde (CH₂O) concentrations in our engine exhaust streams. The results of this research find that formaldehyde is in itself a difficult quantity to measure accurately and consistently, however, what can be stated for our study is that typically, the range of formaldehyde (CH₂O) in the raw exhaust can go from 50 to 150 mg/Nm³ @ 5 % O₂, depending on the fuel analysis and air content.

If a unit is running on Biogas or Landfill Gas (LFG), formaldehyde (CH₂O) is then even more difficult to maintain and measure since Biogas/LFG are high in moisture and sulfur concentrations, which make the use of catalysts difficult due to the potential of catalyst poisoning.

INNIO Jenbacher Gas Engines can only guarantee formaldehyde (CH₂O) values with an Oxidation Catalyst when we run INNIO Jenbacher Gas Engine Standard Natural Gas. In this case we could achieve levels of 60~70 mg/Nm³ @ 5% O₂ on the measurement method VDI 3862.

Details regarding INNIO Jenbacher Gas Engines gas quality limits can be found in the Jenbacher Fuel Specification Technical Instruction, TA 1000-0300.

INNIO Jenbacher GmbH & Co OG
Achenseestrasse 1-3
6020 Jenbach

August 26, 2025

INNIO Jenbacher confirms that the pollutants, in the amounts listed below, measured after the exhaust aftertreatment system (ATS), are confirmed as valid "NOT TO EXCEED" values for stationary applications per engine for the:

Project Name: JMC624 L101 with SCR (stack out)

Emission values (as half hour average values) *):

Species	Unit	Value	Testing by
NO _x	g/bhp-hr	0.025	EPA method 7E, or EN 14792 (CLD)
CO	g/bhp-hr	0.072	EPA method 10, or DIN EN 15058 (NDIR)
VOC (as NMNEHC)	g/bhp-hr	0.034	**))
CH ₂ O	g/bhp-hr	0.009	VDI3862-Page 2 (AHMT), or 4 (DNPH), or 8 (FTIR) or equivalent US measurement method, e.g. FTIR according EPA method 320
PM _{2.5} / PM ₁₀ ***)	g/bhp-hr	0.009	EN-13284-1
SO ₂ ****)	g/bhp-hr	0.015	Wet sampling and ion-chromatography variant according ISO11632 or DIN EN 14791

*) Emission values do not account for measurement tolerances.

**) Evaluated using single determination of C_xH_y from dry exhaust gas with GC-WLD or GC-FID. Every component must be calibrated. Collective test over 30 minutes or the average of 10 single measurements within 30 minutes.

***) PM₁₀ and PM_{2.5} are by experience at engine out nearly identical. Values refers to fuel with no impurities and particle free combustion air.

****) No guarantee as main impacting factor is typically the Sulphur content of the fuel. Lubrication oil Sulphur is a minor factor and depends on brand and type.

Definitions:

NO _x	as NO ₂
NMNEHC	Non-Methane-Non-Ethane-Hydrocarbons (only C _x H _y species with x>2 + C ₂ H ₄), calculated as C ₃ H ₈
CH ₂ O	Formaldehyde
VOC	Volatile Organic Compounds as per EPA Rule 102 Definition
PM#	Particulate Matter (2.5 micro, 10 micron)
SO#	Sulfur Oxides
SCR	Selective Catalytic Reactor

The following criteria apply for demonstration purposes:

- 1) Operation will be on Natural Gas which must meet the INNIO Jenbacher gas quality requirements stated in the Technical Instruction 1000-0300.
- 2) Emission values are based on the binding fuel gas analysis (Appendix I).
- 3) Based on the nominal mass flow provided by the project specific data sheets.
- 4) For emissions values WITH an oxygen reference (ppm @ 15% O₂ or mg/Nm³ @ 5% O₂), stated emissions values are valid between 50% and 100% rated stable load (not for island mode). For emissions values WITHOUT an oxygen reference (lbs/hr, g/bhp-hr, etc), values shown are valid between 80% to 100% of rated stable load (not for island mode).

- 5) For operation between 75% and 100% if operating in Island mode. If Island mode operations are carried out, above values are valid within 2% of nominal load, allowing for a measurement stabilization recovery time of 5 minutes after a load change greater than 2% of nominal.
- 6) Emission values apply after the ATS has reached the specified functional temperature, the reductant dosing release was given, and the Emissions Controller has balanced all actuators to the target value.
- 7) Please note that the emission values are expected to drift slowly upward as deposits coming from fuel or oil build up in the engine and the catalyst, and as the engine and the catalyst experience normal wear. The emission values are for first startup only not-to-exceed values. The drifts can be decreased by following INNIO Jenbacher specific maintenance and repair schedules along with the use of genuine INNIO Jenbacher parts and components.
NOx drift can be compensated up to a certain extent, by calibration of engine operating parameters in the DIA.NE XT controls system by specially trained qualified personnel. Excessive deposits resulting from gas contamination may require the cleaning of the combustion chamber and turbochargers.
- 8) Maintenance and component repairs for the INNIO Jenbacher Gas Engines and ATS equipment is carried out by qualified personnel strictly according to the schedule and repair requirements set by INNIO Jenbacher along with the use of genuine INNIO Jenbacher parts and components.
- 9) Testing to determine compliance with this commitment will be at the expense of the customer and accomplished by a certified laboratory chosen by the customer. The engine/installation is to be in good working order consistent with INNIO Jenbacher recommended maintenance practices prior to any testing. INNIO Jenbacher reserves the right to participate and/or challenge the results of any testing.

If the engine fails to meet the emissions representations the customer must provide the following supporting documentation to INNIO Jenbacher:

- 1) Fuel gas samples
- 2) Complete maintenance records
- 3) A full report including the calculations and results of any emissions testing.

INNIO Jenbacher will be given a reasonable amount of time to take any or all of the following actions:

- Perform additional testing in an effort demonstrate the emissions representations. If this testing demonstrates compliance with no adjustments required to the engine, customer will pay for added testing. If testing fails to demonstrate compliance with the emissions representations, the testing will be paid for by INNIO Jenbacher.
- Make such adjustments to the engine so as to bring the engine into compliance with the emissions limits provided in this letter.

Declaration (acc. ISO/IEC 17050-1:2004)

We hereby confirm that stationary Jenbacher Gas Engines are labelled as follows:

“THIS ENGINE IS EXCLUDED FROM THE REQUIREMENT OF 40 CFR PART 1048 AS A “STATIONARY ENGINE”. INSTALLING OR USING THIS ENGINE IN ANY OTHER APPLICATION MAY BE A VIOLATION OF FEDERAL LAW SUBJECT TO CIVIL PENALTY AND THE OWNER/OPERATOR MUST COMPLY WITH THE REQUIREMENT OF CFR PART 60. THIS ENGINE IS NOT PART OF A REQUIRED OR VOLUNTARY CERTIFICATION PROGRAM AND IS CLASSIFIED AS NON-CERTIFIED PER 40 CFR PART 60, SUBPART JJJJ”.

INNIO Jenbacher GmbH & Co OG
Achenseestrasse 1-3
6020 Jenbach

Released by: Cesar Gomez

Appendix I (Binding fuel gas composition used for emissions prediction):
Natural Gas:

Component	Vol% or Mol%
Methane	92%
Ethane	7%
Propane	<0.5%
Butane	<0.12%
C5+	<0.05%
Nitrogen	0.4%
Carbon Dioxide	0.2%

**El Paso Natural Gas
FERC Gas Tariff Quality Provisions**

Components	Units	EPNG Receipt Into EPNG	EPNG Delivery From EPNG
Hydrogen Sulfide H ₂ S	Grains/100scf	0.25	0.25
H ₂ O (Water Vapor)	lbs/MMscf	7	7
CO ₂ (Carbon Dioxide)	Mole %	2.00%	3%
N ₂ (Nitrogen)	Mole %	No Specification	No Specification
O ₂ (Oxygen)	Mole %	0.20%	0.2%
Diluents	Mole %	3.00%	4%
Heating Value Gross	Btu Max	No Specification	No Specification
	Btu Min	967	967 (995 Calif.)
Hydrocarbon Dew Point	Degrees Fahrenheit	20°F @ Normal Pipeline Pressures	20°F @ 600 psig
Hydrocarbon GPM	Gallons/MMscf	No Specification	No Specification
Hydrocarbon Liquids		shall be free at point of Receipt	shall be free at point of Delivery
Flowing Temperatures	Maximum Fahrenheit	120°F	120°F
	Minimum Fahrenheit	50°F	50°F
Mercaptan (RSH)	Grains/100scf	0.75	0.30
Organic Sulfur (OS)	Grains/100scf	1.25	0.50
Total Sulfur (TS)	Grains/100scf	5.0	0.75
Dust, Gums, Solid Matter		Commercially Free	Commercially Free
Objectionable Odors, Water, or Other Substances		shall be free of	
Deleterious Substances		shall not contain in concentrations that are hazardous to health, pipeline or merchantability	shall not contain in concentrations that are hazardous to health, pipeline or merchantability
Liquids (Water & Hydrocarbons)		Free of at Receipt temperature and pressure	Free of at Delivery temperature and pressure

Table 3.2-2. UNCONTROLLED EMISSION FACTORS FOR 4-STROKE LEAN-BURN ENGINES^a
(SCC 2-02-002-54)

Pollutant	Emission Factor (lb/MMBtu) ^b (fuel input)	Emission Factor Rating
Criteria Pollutants and Greenhouse Gases		
NO _x ^c 90 - 105% Load	4.08 E+00	B
NO _x ^c <90% Load	8.47 E-01	B
CO ^c 90 - 105% Load	3.17 E-01	C
CO ^c <90% Load	5.57 E-01	B
CO ₂ ^d	1.10 E+02	A
SO ₂ ^e	5.88 E-04	A
TOC ^f	1.47 E+00	A
Methane ^g	1.25 E+00	C
VOC ^h	1.18 E-01	C
PM10 (filterable) ⁱ	7.71 E-05	D
PM2.5 (filterable) ⁱ	7.71 E-05	D
PM Condensable ^j	9.91 E-03	D
Trace Organic Compounds		
1,1,2,2-Tetrachloroethane ^k	<4.00 E-05	E
1,1,2-Trichloroethane ^k	<3.18 E-05	E
1,1-Dichloroethane	<2.36 E-05	E
1,2,3-Trimethylbenzene	2.30 E-05	D
1,2,4-Trimethylbenzene	1.43 E-05	C
1,2-Dichloroethane	<2.36 E-05	E
1,2-Dichloropropane	<2.69 E-05	E
1,3,5-Trimethylbenzene	3.38 E-05	D
1,3-Butadiene ^k	2.67E-04	D
1,3-Dichloropropene ^k	<2.64 E-05	E
2-Methylnaphthalene ^k	3.32 E-05	C
2,2,4-Trimethylpentane ^k	2.50 E-04	C
Acenaphthene ^k	1.25 E-06	C

Table 3.2-2. UNCONTROLLED EMISSION FACTORS FOR 4-STROKE LEAN-BURN ENGINES (Continued)

Pollutant	Emission Factor (lb/MMBtu) ^b (fuel input)	Emission Factor Rating
Acenaphthylene ^k	5.53 E-06	C
Acetaldehyde ^{k, l}	8.36 E-03	A
Acrolein ^{k, l}	5.14 E-03	A
Benzene ^k	4.40 E-04	A
Benzo(b)fluoranthene ^k	1.66 E-07	D
Benzo(e)pyrene ^k	4.15 E-07	D
Benzo(g,h,i)perylene ^k	4.14 E-07	D
Biphenyl ^k	2.12 E-04	D
Butane	5.41 E-04	D
Butyr/Isobutyraldehyde	1.01 E-04	C
Carbon Tetrachloride ^k	<3.67 E-05	E
Chlorobenzene ^k	<3.04 E-05	E
Chloroethane	1.87 E-06	D
Chloroform ^k	<2.85 E-05	E
Chrysene ^k	6.93 E-07	C
Cyclopentane	2.27 E-04	C
Ethane	1.05 E-01	C
Ethylbenzene ^k	3.97 E-05	B
Ethylene Dibromide ^k	<4.43 E-05	E
Fluoranthene ^k	1.11 E-06	C
Fluorene ^k	5.67 E-06	C
Formaldehyde ^{k, l}	5.28 E-02	A
Methanol ^k	2.50 E-03	B
Methylcyclohexane	1.23 E-03	C
Methylene Chloride ^k	2.00 E-05	C
n-Hexane ^k	1.11 E-03	C
n-Nonane	1.10 E-04	C

Table 3.2-2. UNCONTROLLED EMISSION FACTORS FOR 4-STROKE LEAN-BURN ENGINES (Continued)

Pollutant	Emission Factor (lb/MMBtu) ^b (fuel input)	Emission Factor Rating
n-Octane	3.51 E-04	C
n-Pentane	2.60 E-03	C
Naphthalene ^k	7.44 E-05	C
PAH ^k	2.69 E-05	D
Phenanthrene ^k	1.04 E-05	D
Phenol ^k	2.40 E-05	D
Propane	4.19 E-02	C
Pyrene ^k	1.36 E-06	C
Styrene ^k	<2.36 E-05	E
Perchloroethylene ^{k, m}	2.48 E-06	D
Toluene ^k	4.08 E-04	B
Vinyl Chloride ^k	1.49 E-05	C
Xylene ^k	1.84 E-04	B

^a Reference 7. Factors represent uncontrolled levels. For NO_x, CO, and PM₁₀, “uncontrolled” means no combustion or add-on controls; however, the factor may include turbocharged units. For all other pollutants, “uncontrolled” means no oxidation control; the data set may include units with control techniques used for NO_x control, such as PCC and SCR for lean burn engines, and PSC for rich burn engines. Factors are based on large population of engines. Factors are for engines at all loads, except as indicated. SCC = Source Classification Code. TOC = Total Organic Compounds. PM-10 ≤ Particulate Matter 10 microns (μm) aerodynamic diameter. A “<” sign in front of a factor means that the corresponding emission factor is based on one-half of the method detection limit.

^b Emission factors were calculated in units of (lb/MMBtu) based on procedures in EPA Method 19. To convert from (lb/MMBtu) to (lb/10⁶ scf), multiply by the heat content of the fuel. If the heat content is not available, use 1020 Btu/scf. To convert from (lb/MMBtu) to (lb/hp-hr) use the following equation:

$$\text{lb/hp-hr} = (\text{lb/MMBtu}) (\text{heat input, MMBtu/hr}) (1/\text{operating HP, 1/hp})$$

^c Emission tests with unreported load conditions were not included in the data set.

^d Based on 99.5% conversion of the fuel carbon to CO₂. CO₂ [lb/MMBtu] = (3.67)(%CON)(C)(D)(1/h), where %CON = percent conversion of fuel carbon to CO₂, C = carbon content of fuel by weight (0.75), D = density of fuel, 4.1 E+04 lb/10⁶ scf, and

This content is from the eCFR and is authoritative but unofficial.

Title 40 —Protection of Environment

Chapter I —Environmental Protection Agency

Subchapter C —Air Programs

Part 98 —Mandatory Greenhouse Gas Reporting

Subpart W —Petroleum and Natural Gas Systems

Source: 75 FR 74488, Nov. 30, 2010, unless otherwise noted.

Authority: 42 U.S.C. 7401-7671q.

Source: 74 FR 56374, Oct. 30, 2009, unless otherwise noted.

Editorial Note: At 90 FR 21227, May 19, 2025, as required by the Congressional Review Act and Public Law 119-2, the Environmental Protection Agency removed the amendments to §§ 98.3 and 98.4 made effective on Jan. 17, 2025, at 89 FR 91163, Nov. 18, 2024. As of May 19, 2025, §§ 98.3 and 98.4 reverted to the Jan. 16, 2025 version.

Table W-5 to Subpart W of Part 98—Default Methane Population Emission Factors

Industry segment	Source type/component	Emission factor (scf methane/hour/component)
POPULATION EMISSION FACTORS—LNG STORAGE COMPRESSOR, GAS SERVICE		
LNG storage	Vapor Recovery Compressor ¹	4.17
LNG import and export equipment		
POPULATION EMISSION FACTORS—BELOW GRADE TRANSMISSION-DISTRIBUTION TRANSFER STATION COMPONENTS AND BELOW GRADE METERING-REGULATING STATION ² COMPONENTS, GAS SERVICE ³		
Natural gas distribution	Below Grade T-D Transfer Station	0.30
	Below Grade M&R Station	0.30
POPULATION EMISSION FACTORS—DISTRIBUTION MAINS, GAS SERVICE ⁴		
Natural gas distribution	Unprotected Steel	5.1
	Protected Steel	0.57
	Plastic	0.17
	Cast Iron	6.9

¹ Emission Factor is in units of “scf methane/hour/compressor.”

² Excluding customer meters.

³ Emission Factor is in units of “scf methane/hour/station.”

⁴ Emission Factor is in units of “scf methane/hour/mile.”

⁵ Emission Factor is in units of “scf methane/hour/number of services.”

Industry segment	Source type/component	Emission factor (scf methane/ hour/ component)
POPULATION EMISSION FACTORS—DISTRIBUTION SERVICES, GAS SERVICE ⁵		
Natural gas distribution	Unprotected Steel	0.086
	Protected Steel	0.0077
	Plastic	0.0016
	Copper	0.03
POPULATION EMISSION FACTORS—INTERCONNECT, DIRECT SALE, OR FARM TAP STATIONS ^{2 3}		
Onshore natural gas transmission pipeline	Transmission Company Interconnect M&R Station	166
	Direct Sale or Farm Tap Station	1.3
POPULATION EMISSION FACTORS—TRANSMISSION PIPELINES, GAS SERVICE ⁴		
Onshore natural gas transmission pipeline	Unprotected Steel	0.74
	Protected Steel	0.041
	Plastic	0.061
	Cast Iron	27

¹ Emission Factor is in units of "scf methane/hour/compressor."

² Excluding customer meters.

³ Emission Factor is in units of "scf methane/hour/station."

⁴ Emission Factor is in units of "scf methane/hour/mile."

⁵ Emission Factor is in units of "scf methane/hour/number of services."

[89 FR 42326, May 14, 2024]

This content is from the eCFR and is authoritative but unofficial.

Title 40 —Protection of Environment

Chapter I —Environmental Protection Agency

Subchapter C —Air Programs

Part 98 —Mandatory Greenhouse Gas Reporting

Subpart W —Petroleum and Natural Gas Systems

Source: 75 FR 74488, Nov. 30, 2010, unless otherwise noted.

Authority: 42 U.S.C. 7401-7671q.

Source: 74 FR 56374, Oct. 30, 2009, unless otherwise noted.

Editorial Note: At 90 FR 21227, May 19, 2025, as required by the Congressional Review Act and Public Law 119-2, the Environmental Protection Agency removed the amendments to §§ 98.3 and 98.4 made effective on Jan. 17, 2025, at 89 FR 91163, Nov. 18, 2024. As of May 19, 2025, §§ 98.3 and 98.4 reverted to the Jan. 16, 2025 version.

Table W-7 to Subpart W of Part 98—Default Methane Emission Factors for Internal Combustion Equipment

Internal combustion equipment type	Emission factor (kg CH ₄ /mmBtu)
Reciprocating Engine, 2-stroke lean-burn	0.658
Reciprocating Engine, 4-stroke lean-burn	0.522
Reciprocating Engine, 4-stroke rich-burn	0.045
Gas Turbine	0.004

[89 FR 42327, May 14, 2024]

This content is from the eCFR and is authoritative but unofficial.

Title 40 —Protection of Environment

Chapter I —Environmental Protection Agency

Subchapter C —Air Programs

Part 98 —Mandatory Greenhouse Gas Reporting

Subpart C —General Stationary Fuel Combustion Sources

Authority: 42 U.S.C. 7401-7671q.

Source: 74 FR 56374, Oct. 30, 2009, unless otherwise noted.

Editorial Note: At 90 FR 21227, May 19, 2025, as required by the Congressional Review Act and Public Law 119-2, the Environmental Protection Agency removed the amendments to §§ 98.3 and 98.4 made effective on Jan. 17, 2025, at 89 FR 91163, Nov. 18, 2024. As of May 19, 2025, §§ 98.3 and 98.4 reverted to the Jan. 16, 2025 version.

Table C-1 to Subpart C of Part 98—Default CO₂ Emission Factors and High Heat Values for Various Types of Fuel

DEFAULT CO₂ EMISSION FACTORS AND HIGH HEAT VALUES FOR VARIOUS TYPES OF FUEL

Fuel type	Default high heat value	Default CO ₂ emission factor
Coal and coke	mmBtu/short ton	kg CO ₂ /mmBtu
Anthracite	25.09	103.69

¹ The HHV for components of LPG determined at 60 °F and saturation pressure with the exception of ethylene.

² Ethylene HHV determined at 41 °F (5 °C) and saturation pressure.

³ Use of this default HHV is allowed only for: (a) Units that combust MSW, do not generate steam, and are allowed to use Tier 1; (b) units that derive no more than 10 percent of their annual heat input from MSW and/or tires; and (c) small batch incinerators that combust no more than 1,000 tons of MSW per year.

⁴ Reporters subject to subpart X of this part that are complying with § 98.243(d) or subpart Y of this part may only use the default HHV and the default CO₂ emission factor for fuel gas combustion under the conditions prescribed in § 98.243(d)(2)(i) and (d)(2)(ii) and § 98.252(a)(1) and (a)(2), respectively. Otherwise, reporters subject to subpart X or subpart Y shall use either Tier 3 (Equation C-5) or Tier 4.

⁵ Use the following formula to calculate a wet basis HHV for use in Equation C-1: $HHV_w = ((100 - M)/100) * HHV_d$ where HHV_w = wet basis HHV, M = moisture content (percent) and HHV_d = dry basis HHV from Table C-1.

Table C-1 to Subpart C of Part 98, Title 40 (up to date as of 9/08/2025) **Table C-1 to Subpart C of Part 98, Title 40 (Sept. 8, 2025)**
Default CO₂ Emission Factors and High Heat Values for Various...

Fuel type	Default high heat value	Default CO ₂ emission factor
Bituminous	24.93	93.28
Subbituminous	17.25	97.17
Lignite	14.21	97.72
Coal Coke	24.80	113.67
Mixed (Commercial sector)	21.39	94.27
Mixed (Industrial coking)	26.28	93.90
Mixed (Industrial sector)	22.35	94.67
Mixed (Electric Power sector)	19.73	95.52
Natural gas	mmBtu/scf	kg CO ₂ /mmBtu
(Weighted U.S. Average)	1.026×10^{-3}	53.06
Petroleum products—liquid	mmBtu/gallon	kg CO ₂ /mmBtu
Distillate Fuel Oil No. 1	0.139	73.25
Distillate Fuel Oil No. 2	0.138	73.96
Distillate Fuel Oil No. 4	0.146	75.04
Residual Fuel Oil No. 5	0.140	72.93
Residual Fuel Oil No. 6	0.150	75.10
Used Oil	0.138	74.00
Kerosene	0.135	75.20
Liquefied petroleum gases (LPG) ¹	0.092	61.71
Propane ¹	0.091	62.87
Propylene ²	0.091	67.77
Ethane ¹	0.068	59.60
Ethanol	0.084	68.44
Ethylene ²	0.058	65.96

¹ The HHV for components of LPG determined at 60 °F and saturation pressure with the exception of ethylene.

² Ethylene HHV determined at 41 °F (5 °C) and saturation pressure.

³ Use of this default HHV is allowed only for: (a) Units that combust MSW, do not generate steam, and are allowed to use Tier 1; (b) units that derive no more than 10 percent of their annual heat input from MSW and/or tires; and (c) small batch incinerators that combust no more than 1,000 tons of MSW per year.

⁴ Reporters subject to subpart X of this part that are complying with § 98.243(d) or subpart Y of this part may only use the default HHV and the default CO₂ emission factor for fuel gas combustion under the conditions prescribed in § 98.243(d)(2)(i) and (d)(2)(ii) and § 98.252(a)(1) and (a)(2), respectively. Otherwise, reporters subject to subpart X or subpart Y shall use either Tier 3 (Equation C-5) or Tier 4.

⁵ Use the following formula to calculate a wet basis HHV for use in Equation C-1: $HHV_w = ((100 - M)/100) * HHV_d$ where HHV_w = wet basis HHV, M = moisture content (percent) and HHV_d = dry basis HHV from Table C-1.

Table C-1 to Subpart C of Part 98, Title 40 (up to date as of 9/08/2025)
Default CO₂ Emission Factors and High Heat Values for Various Fuels

Fuel type	Default high heat value	Default CO ₂ emission factor
Isobutane ¹	0.099	64.94
Isobutylene ¹	0.103	68.86
Butane ¹	0.103	64.77
Butylene ¹	0.105	68.72
Naphtha (<401 deg F)	0.125	68.02
Natural Gasoline	0.110	66.88
Other Oil (>401 deg F)	0.139	76.22
Pentanes Plus	0.110	70.02
Petrochemical Feedstocks	0.125	71.02
Special Naphtha	0.125	72.34
Unfinished Oils	0.139	74.54
Heavy Gas Oils	0.148	74.92
Lubricants	0.144	74.27
Motor Gasoline	0.125	70.22
Aviation Gasoline	0.120	69.25
Kerosene-Type Jet Fuel	0.135	72.22
Asphalt and Road Oil	0.158	75.36
Crude Oil	0.138	74.54
Petroleum products—solid	mmBtu/short ton	kg CO ₂ /mmBtu.
Petroleum Coke	30.00	102.41.
Petroleum products—gaseous	mmBtu/scf	kg CO ₂ /mmBtu.
Propane Gas	2.516 × 10 ⁻³	61.46.
Other fuels—solid	mmBtu/short ton	kg CO ₂ /mmBtu
Municipal Solid Waste	9.95 ³	90.7
Tires	28.00	85.97

¹ The HHV for components of LPG determined at 60 °F and saturation pressure with the exception of ethylene.

² Ethylene HHV determined at 41 °F (5 °C) and saturation pressure.

³ Use of this default HHV is allowed only for: (a) Units that combust MSW, do not generate steam, and are allowed to use Tier 1; (b) units that derive no more than 10 percent of their annual heat input from MSW and/or tires; and (c) small batch incinerators that combust no more than 1,000 tons of MSW per year.

⁴ Reporters subject to subpart X of this part that are complying with § 98.243(d) or subpart Y of this part may only use the default HHV and the default CO₂ emission factor for fuel gas combustion under the conditions prescribed in § 98.243(d)(2)(i) and (d)(2)(ii) and § 98.252(a)(1) and (a)(2), respectively. Otherwise, reporters subject to subpart X or subpart Y shall use either Tier 3 (Equation C-5) or Tier 4.

⁵ Use the following formula to calculate a wet basis HHV for use in Equation C-1: $HHV_w = ((100 - M)/100) * HHV_d$ where HHV_w = wet basis HHV, M = moisture content (percent) and HHV_d = dry basis HHV from Table C-1.

Table C-1 to Subpart C of Part 98, Title 40 (up to date as of 9/08/2025) **Table C-1 to Subpart C of Part 98, Title 40 (Sept. 8, 2025)**
Default CO₂ Emission Factors and High Heat Values for Various...

Fuel type	Default high heat value	Default CO ₂ emission factor
Plastics	38.00	75.00
Other fuels—gaseous	mmBtu/scf	kg CO ₂ /mmBtu
Blast Furnace Gas	0.092×10^{-3}	274.32
Coke Oven Gas	0.599×10^{-3}	46.85
Fuel Gas ⁴	1.388×10^{-3}	59.00
Biomass fuels—solid	mmBtu/short ton	kg CO ₂ /mmBtu
Wood and Wood Residuals (dry basis) ⁵	17.48	93.80
Agricultural Byproducts	8.25	118.17
Peat	8.00	111.84
Solid Byproducts	10.39	105.51
Biomass fuels—gaseous	mmBtu/scf	kg CO ₂ /mmBtu
Landfill Gas	0.485×10^{-3}	52.07
Other Biomass Gases	0.655×10^{-3}	52.07
Biomass Fuels—Liquid	mmBtu/gallon	kg CO ₂ /mmBtu
Ethanol	0.084	68.44
Biodiesel (100%)	0.128	73.84
Rendered Animal Fat	0.125	71.06
Vegetable Oil	0.120	81.55

¹ The HHV for components of LPG determined at 60 °F and saturation pressure with the exception of ethylene.

² Ethylene HHV determined at 41 °F (5 °C) and saturation pressure.

³ Use of this default HHV is allowed only for: (a) Units that combust MSW, do not generate steam, and are allowed to use Tier 1; (b) units that derive no more than 10 percent of their annual heat input from MSW and/or tires; and (c) small batch incinerators that combust no more than 1,000 tons of MSW per year.

⁴ Reporters subject to subpart X of this part that are complying with § 98.243(d) or subpart Y of this part may only use the default HHV and the default CO₂ emission factor for fuel gas combustion under the conditions prescribed in § 98.243(d)(2)(i) and (d)(2)(ii) and § 98.252(a)(1) and (a)(2), respectively. Otherwise, reporters subject to subpart X or subpart Y shall use either Tier 3 (Equation C-5) or Tier 4.

⁵ Use the following formula to calculate a wet basis HHV for use in Equation C-1: $HHV_w = ((100 - M)/100) * HHV_d$ where HHV_w = wet basis HHV, M = moisture content (percent) and HHV_d = dry basis HHV from Table C-1.

[78 FR 71950, Nov. 29, 2013, as amended at 81 FR 89252, Dec. 9, 2016]

This content is from the eCFR and is authoritative but unofficial.

Title 40 —Protection of Environment

Chapter I —Environmental Protection Agency

Subchapter C —Air Programs

Part 98 —Mandatory Greenhouse Gas Reporting

Subpart C —General Stationary Fuel Combustion Sources

Authority: 42 U.S.C. 7401-7671q.

Source: 74 FR 56374, Oct. 30, 2009, unless otherwise noted.

Editorial Note: At 90 FR 21227, May 19, 2025, as required by the Congressional Review Act and Public Law 119-2, the Environmental Protection Agency removed the amendments to §§ 98.3 and 98.4 made effective on Jan. 17, 2025, at 89 FR 91163, Nov. 18, 2024. As of May 19, 2025, §§ 98.3 and 98.4 reverted to the Jan. 16, 2025 version.

Table C-2 to Subpart C of Part 98—Default CH₄ and N₂O Emission Factors for Various Types of Fuel

Fuel type	Default CH ₄ emission factor (kg CH ₄ /mmBtu)	Default N ₂ O emission factor (kg N ₂ O/mmBtu)
Coal and Coke (All fuel types in Table C-1)	1.1 × 10 ⁻⁰²	1.6 × 10 ⁻⁰³
Natural Gas ¹	1.0 × 10 ⁻⁰³	1.0 × 10 ⁻⁰⁴
Petroleum Products (All fuel types in Table C-1)	3.0 × 10 ⁻⁰³	6.0 × 10 ⁻⁰⁴
Fuel Gas	3.0 × 10 ⁻⁰³	6.0 × 10 ⁻⁰⁴
Other Fuels—Solid	3.2 × 10 ⁻⁰²	4.2 × 10 ⁻⁰³
Blast Furnace Gas	2.2 × 10 ⁻⁰⁵	1.0 × 10 ⁻⁰⁴
Coke Oven Gas	4.8 × 10 ⁻⁰⁴	1.0 × 10 ⁻⁰⁴
Biomass Fuels—Solid (All fuel types in Table C-1, except wood and wood residuals)	3.2 × 10 ⁻⁰²	4.2 × 10 ⁻⁰³
Wood and wood residuals	7.2 × 10 ⁻⁰³	3.6 × 10 ⁻⁰³
Biomass Fuels—Gaseous (All fuel types in Table C-1)	3.2 × 10 ⁻⁰³	6.3 × 10 ⁻⁰⁴
Biomass Fuels—Liquid (All fuel types in Table	1.1 × 10 ⁻⁰³	1.1 × 10 ⁻⁰⁴

Note: Those employing this table are assumed to fall under the IPCC definitions of the “Energy Industry” or “Manufacturing Industries and Construction”. In all fuels except for coal the values for these two categories are identical. For coal combustion, those who fall within the IPCC “Energy Industry” category may employ a value of 1g of CH₄/mmBtu.

Fuel type	Default CH ₄ emission factor (kg CH ₄ /mmBtu)	Default N ₂ O emission factor (kg N ₂ O/mmBtu)
C-1)		

Note: Those employing this table are assumed to fall under the IPCC definitions of the “Energy Industry” or “Manufacturing Industries and Construction”. In all fuels except for coal the values for these two categories are identical. For coal combustion, those who fall within the IPCC “Energy Industry” category may employ a value of 1g of CH₄/mmBtu.

[78 FR 71952, Nov. 29, 2013, as amended at 81 FR 89252, Dec. 9, 2016; 89 FR 42220, May 14, 2024]

Weighted Average of Fuel Gas

Component	MW	(Mol %)	Wt lb/lbmol Gas	(Wt %)
Helium	4	0.0000	0.0000	0.0000
Hydrogen	2.02	0.0000	0.0000	0.0000
Carbon Dioxide	44.01	0.0742	0.0327	0.1994
Nitrogen	28.01	2.4676	0.6912	4.2200
Methane	16.041	97.3361	15.6137	95.3297
Ethane	30.063	0.1091	0.0328	0.2003
Propane	44.092	0.0038	0.0017	0.0102
Isobutane	58.118	0.0000	0.0000	0.0000
n-Butane	58.118	0.0000	0.0000	0.0000
Isopentane	72.114	0.0000	0.0000	0.0000
n-Pentane	72.114	0.0092	0.0066	0.0405
Cyclopentane	70.13	0.0000	0.0000	0.0000
n-Hexane	86.17	0.0000	0.0000	0.0000
Cyclohexane	84.16	0.0000	0.0000	0.0000
Other Hexanes	86.18	0.0000	0.0000	0.0000
Heptanes	100.21	0.0000	0.0000	0.0000
Methycyclohexane	98.19	0.0000	0.0000	0.0000
2,2,4-TMP	114.23	0.0000	0.0000	0.0000
Benzene	78.12	0.0000	0.0000	0.0000
Toluene	92.15	0.0000	0.0000	0.0000
Ethylbenzene	106.17	0.0000	0.0000	0.0000
Xylenes (Total)	106.17	0.0000	0.0000	0.0000
Octanes + Heavies	114.23	0.0000	0.0000	0.0000
Total		100.00	16.38	100.00
Total Hydrocarbon (HC)		97.4582		95.5806
Total VOC (C3+)		0.0130		0.0507
Total HAP		0.0000		0.0000
Total MW (lb/lb-mole)		16.38		



2030 Afton Place
Farmington, NM 87401
(505) 325-6622

Analysis No: SN20251982
Cust No: 69200-15327

Well/Lease/Pipeline Information

Customer Name:	Kinder Morgan	Source:	Meter Run
Pipeline Name:	ENPN Suction - SJ	Pipeline Flowing:	Y
County/State:	San Juan NM	Pressure	783 PSIG
Location:		Flow Temp:	67 DEG. F
Lease/PA/CA:		Ambiebt Temp:	94 DEG F.
Formation:		Flow Rate:	89 MMSCF/D
Cust. Stn. No.:		Sample Method:	Purge & Fill
		Sample Date:	7/23/2025
		Sample Time:	11.35 AM
		Sampled By:	CLL
Heat Trace:	N	Sampled by (NM):	ABC
Remarks:			

Analysis

Component::	Mole%:	Unnormalized%:	**GPM:	*BTU:	*SP Gravity:
Nitrogen	2.4676	2.4676	0.2855	0.00	0.0006
CO2	0.0742	0.0741	0.1267	0.00	0.0757
Methane	97.3361	97.2129	16.2080	983.09	0.5253
Ethane	0.1091	0.1091	0.0290	1.93	0.011
Propane	0.0038	0.0038	0.0010	0.10	0.0001
Iso-Butane	0.0000	0.0000	0.0000	0.00	0.0000
N-Butane	0.0000	0.0000	0.0000	0.00	0.0000
I-Pentane	0.0000	0.0000	0.0000	0.00	0.0000
N-Pentane	0.0092	0.0092	0.0030	0.37	0.0002
Hexane Plus	0.0000	0.0000	0.0000	0.00	0.0000
Total	100.0000	99.8767	16.6532	985.49	0.6129

* @ 14.730 PSIA DRY & UNCORRECTED FOR COMPRESSIBILITY

** @ 14.730 PSIA & 60 DEG. F.

COMPRESSIBILITY FACTOR (1/Z):	1.0021	CYLINDER #:	186
BTU/CU.FT IDEAL:	987.8	CYLINDER PRESSURE:	313 PSIG
BTU/CU.FT (DRY) CORRECTED FOR 1/Z:	989.8	ANALYSIS DATE:	7/25/2025
BTU/CU.FT (WET) CORRECTED FOR 1/Z:	972.6	ANALYSIS TIME:	1:52:32 PM
DRY BTU @ 15.025:	1009.6	ANALYSIS RUN BY:	SARAH BALLARD
REAL SPECIFIC GRAVITY:	0.614		

GPM, BTU, AND SPG calculations as shown above are based on current GPA standards.

GPA Standard: GPA-2261

GC: Danalyzer Model 500

Last Cal/Verify 07/10/2025

GC Method: C6+ Gas

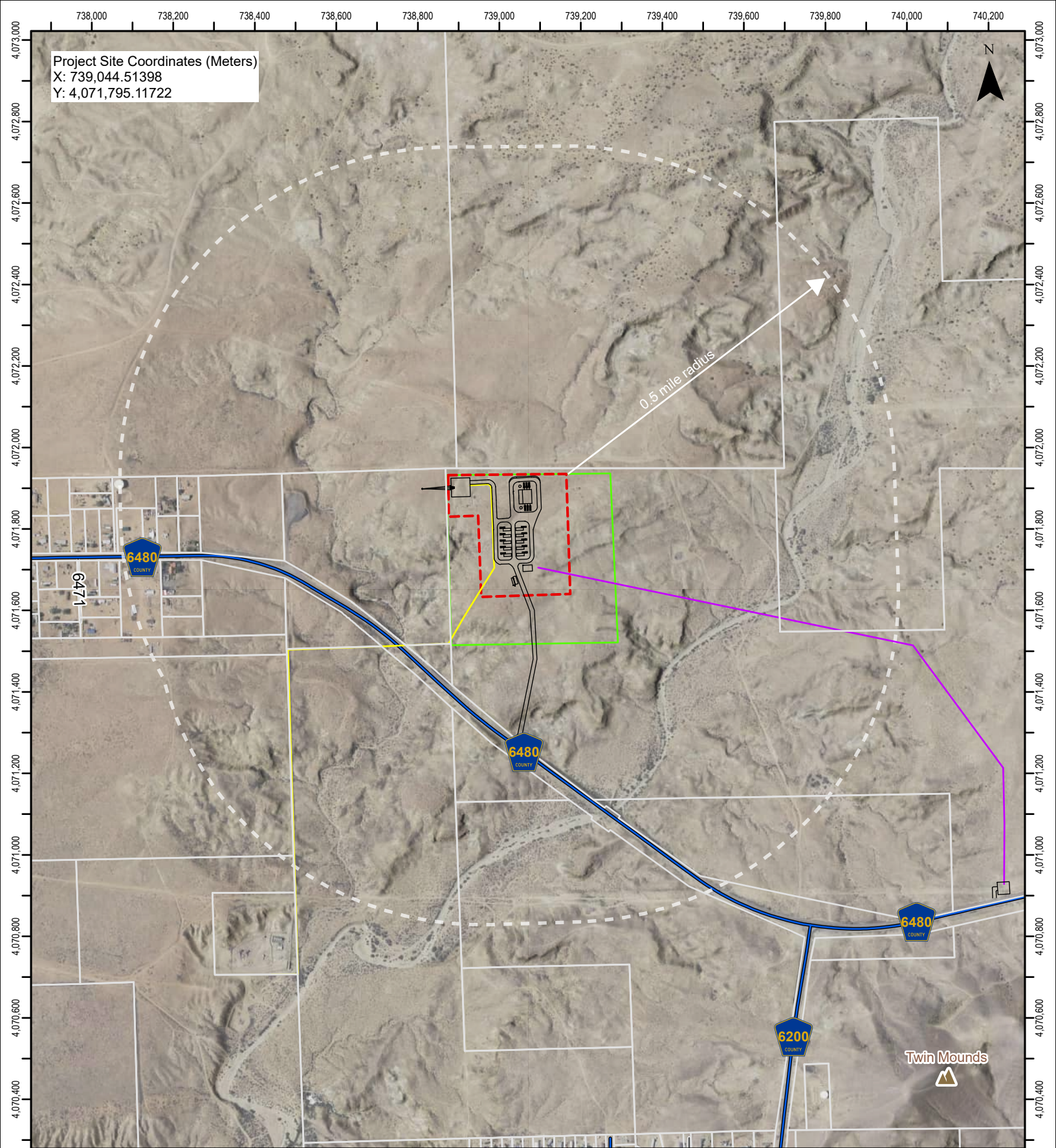
Section 8

Map(s)

A map such as a 7.5 minute topographic quadrangle showing the exact location of the source. The map shall also include the following:

The UTM or Longitudinal coordinate system on both axes	An indicator showing which direction is north
A minimum radius around the plant of 0.8km (0.5 miles)	Access and haul roads
Topographic features of the area	Facility property boundaries
The name of the map	The area which will be restricted to public access
A graphical scale	

A map is provided on the following page.



Project Site Coordinates (Meters)
X: 739,044.51398
Y: 4,071,795.11722

0.5 mile radius

Twin Mounds

SADDLE BUTTE

SLR

Key:

Proposed Facility

Gas Pipeline

Powerline (480v)

Site Features

Fenceline

Facility Property Boundary

Roads

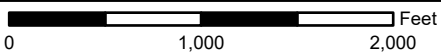
Paved

Unpaved

Parcels

Peaks

Proposed Westside Station Power Plant Overview



Date: 9/9/2025

NAD 1983 UTM Zone 12N

Section 9

Proof of Public Notice

(for NSR applications submitting under 20.2.72 or 20.2.74 NMAC)

(This proof is required by: 20.2.72.203.A.14 NMAC “Documentary Proof of applicant’s public notice”)

☒ I have read the AQB “Guidelines for Public Notification for Air Quality Permit Applications”

This document provides detailed instructions about public notice requirements for various permitting actions. It also provides public notice examples and certification forms. Material mistakes in the public notice will require a re-notice before issuance of the permit.

Unless otherwise allowed elsewhere in this document, the following items document proof of the applicant’s Public Notification. Please include this page in your proof of public notice submittal with checkmarks indicating which documents are being submitted with the application.

New Permit and **Significant Permit Revision** public notices must include all items in this list.

Technical Revision public notices require only items 1, 5, 9, and 10.

Per the Guidelines for Public Notification document mentioned above, include:

1. ☒ A copy of the certified letter receipts with post marks (20.2.72.203.B NMAC)
 2. ☒ A list of the places where the public notice has been posted in at least four publicly accessible and conspicuous places, including the proposed or existing facility entrance. (e.g: post office, library, grocery, etc.)
 3. ☒ A copy of the property tax record (20.2.72.203.B NMAC).
 4. ☒ A sample of the letters sent to the owners of record.
 5. ☒ A sample of the letters sent to counties, municipalities, and Indian tribes.
 6. ☒ A sample of the public notice posted and a verification of the local postings.
 7. ☒ A table of the noticed citizens, counties, municipalities and tribes and to whom the notices were sent in each group.
 8. ☒ A copy of the public service announcement (PSA) sent to a local radio station and documentary proof of submittal.
 9. ☒ A copy of the classified or legal ad including the page header (date and newspaper title) or its affidavit of publication stating the ad date, and a copy of the ad. When appropriate, this ad shall be printed in both English and Spanish.
 10. ☒ A copy of the display ad including the page header (date and newspaper title) or its affidavit of publication stating the ad date, and a copy of the ad. When appropriate, this ad shall be printed in both English and Spanish.
 11. ☒ A map with a graphic scale showing the facility boundary and the surrounding area in which owners of record were notified by mail. This is necessary for verification that the correct facility boundary was used in determining distance for notifying land owners of record.
-



TRACK STATUS BY TEXT MESSAGE
Send tracking number to 20773 (USPS)
Standard message and data rates may apply.
TRACK STATUS ONLINE
Visit usps.com/track for tracking
Text and email alerts available

PURCHASE DETAILS

Product	Qty	Unit Price	Price
First-Class Mail® Letter	1		\$0.78
Auburn, WA 98092 Weight: 0 lb 0.50 oz Estimated Delivery Date Wed 09/10/2025			
Certified Mail®			\$5.30
Tracking #: 70141200000220567397			
Total			\$6.08
First-Class Mail® Letter	1		\$0.78
Aztec, NM 87410 Weight: 0 lb 0.50 oz Estimated Delivery Date Mon 09/08/2025			
Certified Mail®			\$5.30
Tracking #: 70141200000220567434			
Total			\$6.08
First-Class Mail® Letter	1		\$0.78
Towaoc, CO 81334 Weight: 0 lb 0.50 oz Estimated Delivery Date Mon 09/08/2025			
Certified Mail®			\$5.30
Tracking #: 70141200000220567472			
Total			\$6.08
First-Class Mail® Letter	1		\$0.78
Window Rock, AZ 86515 Weight: 0 lb 0.50 oz Estimated Delivery Date Mon 09/08/2025			
Certified Mail®			\$5.30
Tracking #: 70140510000223510809			
Total			\$6.08
First-Class Mail® Letter	1		\$0.78
Kirtland, NM 87417 Weight: 0 lb 0.60 oz Estimated Delivery Date Mon 09/08/2025			
Certified Mail®			\$5.30
Tracking #: 70141200000220567427			
Total			\$6.08
First-Class Mail® Letter	1		\$0.78
Farmington, NM 87401 Weight: 0 lb 0.50 oz Estimated Delivery Date Mon 09/08/2025			
Certified Mail®			\$5.30
Tracking #: 70141200000220567410			
Total			\$6.08
Grand Total:			\$36.48
Credit Card Remit			\$36.48
Card Name: VISA Account #: XXXXXXXXXX3339 Approval #: 051260 Transaction #: 861 AID: A0000000031010 Contactless AL: VISA CREDIT			

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Postage	\$0.78
Certified Fee	\$5.30
Return Receipt Fee (Endorsement Required)	\$0.00
Restricted Delivery Fee (Endorsement Required)	\$0.00
Total Postage & Fees	\$6.08

Solar Lands, LLC
5324 Bridget Ave SE
Auburn, WA 98092

SEP 5 2025

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Restricted Delivery Fee (Endorsement Required)	\$0.00
Total Postage & Fees	\$6.08

San Juan County Clerk
Alyssa Kuhn
PO Box 550
Aztec, NM 87410

SEP 5 2025

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Return Receipt Fee (Endorsement Required)	\$0.00
Restricted Delivery Fee (Endorsement Required)	\$0.00
Total Postage & Fees	\$6.08

Navajo Nation
President Buu Van Nygren
PO Box 7440
Window Rock, AZ 86515

SEP 5 2025

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Restricted Delivery Fee (Endorsement Required)	\$0.00
Total Postage & Fees	\$6.08

Kirtland Town Clerk
Jonathan LaMone
47 Rd 6500
Kirtland, NM 87417

SEP 5 2025

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Restricted Delivery Fee (Endorsement Required)	\$0.00
Total Postage & Fees	\$6.08

Ute Mountain Ute Tribe Chairman
Manuel Heart
125 Mike Wash Rd
Towaoc, CO 81334

SEP 5 2025

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(Domestic Mail Only; No Insurance Coverage Provided)
For delivery information visit our website at www.usps.com

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Return Receipt Fee (Endorsement Required)	\$0.00
Restricted Delivery Fee (Endorsement Required)	\$0.00
Total Postage & Fees	\$6.08

Farmington City Clerk
Andrea Jones
800 Municipal Dr
Farmington, NM 87401

SEP 5 2025

Table of Noticed Neighbors

Name	Address	City	State	Zip Code
Solar Lands LLC	5324 Bridget Ave SE	Auburn	WA	98092

Table of Noticed Municipalities

Name	Address	City	State	Zip Code
Farmington - City Clerk Andrea Jones	800 Municipal Dr	Farmington	NM	87401
Kirtland - Town Clerk Jonathan LaMone	47 Rd 6500	Kirtland	NM	87417

Table of Noticed Counties

Name	Address	City	State	Zip Code
San Juan County - County Clerk Alyssa Kuhn	PO Box 550	Aztec	NM	87410

Table of Noticed Indian Tribes

Name	Address	City	State	Zip Code
Navajo Nation - President Buu Van Nygren	PO Box 7440	Window Rock	AZ	86515
Ute Mountain Ute Tribe - Chairman Manuel Heart	125 Mike Wash Rd	Towaoc	CO	81334

Table of Public Notice Postings

Location	Address	City	State	Zip Code
US Post Office	4211 US-64	Kirtland	NM	87417
Town of Kirtland Town Hall	47 Rd 6500	Kirtland	NM	87417
Lower Valley Water Users	4286 US-64	Kirtland	NM	87417
Near Proposed Facility Entrance (36.7571, -108.3222)		Kirtland	NM	87417

Property Record Card

San Juan County Assessor

SOLAR LANDS LLC

5324 BRIDGET AVE SE
AUBURN, WA 98092

Account: R0080284

Tax Area: 22OUTNR - Dist 22OUT
Non-Residential

Acres: 406.900

Parcel: 2082173066330

Situs Address:
ROAD 6480
KIRTLAND, 87417

Value Summary**Value By:**

Land (1)

Total**Market**

\$162,760

\$162,760

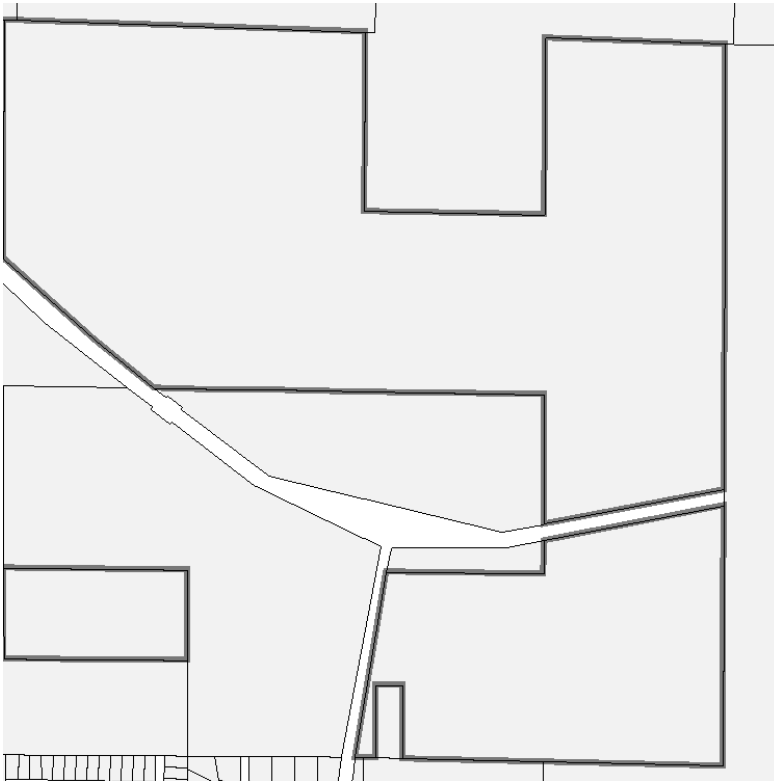
Override

N/A

\$162,760

Legal Description

LOTS 1, 3, 4, S/2NW, S/2NE, NESE, S/2SE, N/2SWSW OF SEC 4 29 14.
LESS AND EXCEPT BK.1151 PG.538 AND RIGHT OF WAYS
CONVEYED FOR ROADS 6480 AND 6200 BK.1683 PG.769

**Land Occurrence 1**

Property Code	0200 - NON-RESIDENTIAL LAND	Land Code	32280A - KTLD LG PARCELS N US 64 - A
Frontage	0	Measure	A - Acre
Street Code	3 - Paved	Topography Code	3 - Rolling

SubArea	ACTUAL	AREA_UNITS	EFFECTIVE	FOOTPRINT	HEATED
Acres	406.9	406.9	406.9	406.9	406.9
Total	406.90	406.90	406.90	406.90	406.90
	Value	Rate	Rate	Rate	Rate
	\$162,760	400.00	400.00	400.00	400.00

Abstract Summary

Code	Classification	Actual Value	Value	Taxable Value	Actual Value Override	Taxable Override
0200	NON-RESIDENTIAL LAND		\$162,760	\$54,253	NA	NA
Total			\$162,760	\$54,253	NA	NA

September 4, 2025

CERTIFIED MAIL 7014 1200 0002 2056 7397

RETURN RECEIPT REQUESTED (*certified mail is required, **return receipt is optional***)

Dear **Neighbor**

Saddle Butte Energy Farmington, LLC announces its application to the New Mexico Environment Department for an air quality permit for the Construction of its power generation facility. This facility is being developed in collaboration with the Farmington Electric Utility System to support the local power grid with efficient, reliable, rapidly dispatchable power. The expected date of application submittal to the Air Quality Bureau is September 10, 2025.

The exact location for the proposed facility known as, Westside Station, will be at latitude 36.7619 dec deg North and longitude -108.32210 dec deg West. The approximate location of this facility is 0.75 miles Northwest of the intersection of Rd 6480 and Rd 6200 San Juan county.

The proposed construction will consist of installing Six (6) Jenbacher J620 high-efficiency ultra-low emission natural gas-fired engines, Ten (10) Jenbacher J624 high-efficiency ultra-low emission natural gas-fired engines, two (2) lube oil tanks, transformers and natural gas handling equipment.

The estimated maximum quantities of any regulated air contaminant will be as follows in pound per hour (pph) and tons per year (tpy) and may change slightly during the course of the Department's review:

Pollutant:	Pounds per hour	Tons per year
Particulate Matter (PM)	<0.1 pph	0.2 tpy
PM ₁₀	<0.1 pph	0.2 tpy
PM _{2.5}	<0.1 pph	0.2 tpy
Sulfur Dioxide (SO ₂)	1.1 pph	4.8 tpy
Nitrogen Oxides (NO _x)	36.3 pph	159.0 tpy
Carbon Monoxide (CO)	26.5 pph	115.9 tpy
Volatile Organic Compounds (VOC)	10.6 pph	46.6 tpy
Total sum of all Hazardous Air Pollutants (HAPs)	12.3 pph	53.8 tpy
Toxic Air Pollutant (TAP)	7.3 pph	32.1 tpy
Ammonia	7.3 pph	32.1 tpy
Green House Gas Emissions as Total CO ₂ e	n/a	307,117 tpy

The facility may operate up to 24 hours a day, 7 days a week, depending on energy demand.

If you have any comments about the construction or operation of this facility, and you want your comments to be made as part of the permit review process, you must submit your comments in writing to this address: Permit Programs Manager; New Mexico Environment Department; Air Quality Bureau; 525 Camino de los Marquez, Suite 1; Santa Fe, New Mexico; 87505-1816. Other comments and questions may be submitted verbally. (505) 476-4300; 1 800 224-7009.

Please refer to the company name and facility name, or send a copy of this notice along with your comments, since the Department may have not yet received the permit application. Please include a legible return mailing address with your comments. Once the Department has performed a preliminary review of the application and its air quality impacts, the Department's notice will be published in the legal section of a newspaper circulated near the facility location.

Atención

Este es un aviso de la oficina de Calidad del Aire del Departamento del Medio Ambiente de Nuevo México, acerca de las emisiones producidas por un establecimiento en esta área. Si usted desea información en español, por favor comuníquese con esa oficina al teléfono 505-629-7748.

Sincerely,

Saddle Butte Energy Farmington, LLC
1900 16th St, Suite 200,
Denver CO 80202

Notice of Non-Discrimination

NMED does not discriminate on the basis of race, color, national origin, disability, age or sex in the administration of its programs or activities, as required by applicable laws and regulations. NMED is responsible for coordination of compliance efforts and receipt of inquiries concerning non-discrimination requirements implemented by 40 C.F.R. Part 7, including Title VI of the Civil Rights Act of 1964, as amended; Section 504 of the Rehabilitation Act of 1973; the Age Discrimination Act of 1975, Title IX of the Education Amendments of 1972, and Section 13 of the Federal Water Pollution Control Act Amendments of 1972. If you have any questions about this notice or any of NMED's non-discrimination programs, policies or procedures, or if you believe that you have been discriminated against with respect to a NMED program or activity, you may contact: Non-Discrimination Coordinator, NMED, 1190 St. Francis Dr., Suite N4050, P.O. Box 5469, Santa Fe, NM 87502, (505) 827-2855, nd.coordinator@env.nm.gov. You may also visit our website at <https://www.env.nm.gov/non-employee-discrimination-complaint-page/> to learn how and where to file a complaint of discrimination.

September 4, 2025

CERTIFIED MAIL 7014 1200 0002 2056 7472

RETURN RECEIPT REQUESTED (*certified mail is required, **return receipt is optional***)

Dear **Chairman**

Saddle Butte Energy Farmington, LLC announces its application to the New Mexico Environment Department for an air quality permit for the Construction of its power generation facility. This facility is being developed in collaboration with the Farmington Electric Utility System to support the local power grid with efficient, reliable, rapidly dispatchable power. The expected date of application submittal to the Air Quality Bureau is September 10, 2025.

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PM ₁₀	<0.1 pph	0.2 tpy
PM _{2.5}	<0.1 pph	0.2 tpy
Sulfur Dioxide (SO ₂)	1.1 pph	4.8 tpy
Nitrogen Oxides (NO _x)	36.3 pph	159.0 tpy
Carbon Monoxide (CO)	26.5 pph	115.9 tpy
Volatile Organic Compounds (VOC)	10.6 pph	46.6 tpy
Total sum of all Hazardous Air Pollutants (HAPs)	12.3 pph	53.8 tpy
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Sincerely,

Saddle Butte Energy Farmington, LLC
1900 16th St, Suite 200,
Denver CO 80202

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Pollutant:	Pounds per hour	Tons per year
Particulate Matter (PM)	<0.1 pph	0.2 tpy
PM ₁₀	<0.1 pph	0.2 tpy
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Green House Gas Emissions as Total CO ₂ e	n/a	307,117 tpy

The facility may operate up to 24 hours a day, 7 days a week, depending on energy demand.

The owner and/or operator of the Facility is:
Saddle Butte Energy Farmington, LLC
1900 16th St, Suite 200,
Denver CO 80202

If you have any comments about the construction or operation of this facility, and you want your comments to be made as part of the permit review process, you must submit your comments in writing to this address: Permit Programs Manager; New Mexico Environment Department; Air Quality Bureau; 525 Camino de los Marquez, Suite 1; Santa Fe, New Mexico; 87505-1816. Other comments and questions may be submitted verbally. (505) 476-4300; 1 800 224-7009.

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General Posting of Notices – Certification

I, Christian Stoddard, the undersigned, certify that on **September 5, 2025**, posted a true and correct copy of the attached Public Notice in the following publicly accessible and conspicuous places in the town of Kirtland of San Juan County, State of New Mexico on the following dates:

1. Facility entrance 9/5/25
2. US Post Office, 4211 US-64 Kirtland, NM 87417 9/5/25
3. Town of Kirtland Town Hall, 47 Rd 6500 Kirtland, NM 87417 9/5/25
4. Lower Valley Water Users, 4286 US-64 Kirtland, NM 87417 9/5/25

Signed this 5TH day of September, 2025.


Signature

9/5/25
Date

Christian Stoddard
Printed Name

Director of Planning
Title – Director of Planning, Saddle Butte Energy Farmington, LLC

[illegible]

Kirtland Town Hall

9/5/2025

Town of Kirtland News



TOWN OF KIRTLAND
Town Council Regular Meeting Agenda
Council Chambers
47 RD 6500 Kirtland, NM 87417
August 12, 2025 at 5:00 pm

- Call to Order
- Invocation
- Pledge of Allegiance
- Regular Meeting
- Approval of Agenda
 - Approval of the August 12, 2025 Regular Meeting Agenda
 - Approval of consent agenda to include:
 - Gift Meeting Minutes from July 17, 2025
 - July 2025 Financial Report
- Old Business
 - Sally Dog SWD Remediation review and possible vote
 - Sign posting update
 - San Juan County Regular Local Election reminder
 - Civil Community Clean Up reminder
 - Readdressing discussion
 - Hayes Valley median discussion
 - Valley Water and Sanitation District audit update
- New Business
 - Sewage report
 - SBB hardware and software upgrade quote review and vote
 - Constitution Week Proclamation - Daughter of the American Revolution review and vote
 - First Responders Family Fun Day Event discussion and possible donation vote
 - Certified Public Accountant (CPA) review, selection and vote
 - San Juan County FY 2025 billing invoices discussion and vote
 - NextLevel additional camera installation quote review and vote
 - South Cullen Renewables solar panel installation discussion
 - TOR/SIC Addressing Boundary MCU triggering event discussion and possible vote
- Reports from Elected Officials

Agenda posted by the Kirtland Town Clerk 8-8-2025

Town Council Meeting Schedule



PUBLIC NOTICE

Notice is hereby given that the Town of Kirtland has opted-in to the 2025 Regular Local Election with San Juan County.

The following positions will be open for the 2025 Regular Local Election:

- Mayor (4 Year Term, starting January 1, 2026)
- Councilor Position 1 (4 Year Term, starting January 1, 2026)
- Councilor Position 2 (4 Year Term, starting January 1, 2026)

Candidate Filing Day: **Tuesday, August 26, 2025** from 9:00 am to 5:00 pm at the San Juan County Administration Building, located at 100 South Clear Drive, Suite 203, Aztec, NM 87410.

Election Day: **Tuesday, November 4, 2025** from 7:00 am to 7:00 pm at various locations throughout San Juan County.

For any questions or concerns regarding this notice or for candidate filing forms, please contact the Town Clerk via email at clerk@kirtlandnm.org or call at 505-598-4160.

Filed in the Office of the Town Clerk on the 24th day of June 2025.

Town Clerk

NOTICE

Secede Butte Energy Farmington, LLC announces its application to the New Mexico Environment Department for an air quality permit for the construction of its power generation facility. This facility is being developed in collaboration with the Farmington Electric Utility System to support the local power grid with efficient, reliable, rapidly dispatchable power. The expected date of application submission to the Air Quality Bureau is September 10, 2025.

The exact location for the proposed facility known as, Westside Station, will be at latitude 36.7619 and longitude 106.32210 (36.7619 and 106.32210). The approximate location of this facility is 0.75 miles Northwest of the intersection of Rd 6500 and Rd 6700 San Juan County.

The proposed construction will consist of installing six (6) Jenbacher 800 high-efficiency ultra-low emission natural gas-fired engines, two (2) tube oil tanks, transformers and natural gas handling equipment.

The estimated maximum quantities of any regulated air contaminants will be as follows in pounds per hour (pphr) and tons per year (tpy). These reported emissions could change slightly during the course of the Department's review.

Pollutant	Pounds per hour	Tons per year
Particulate Matter (PM)	<0.1 pph	0.2 tpy
PM ₁₀	<0.1 pph	0.2 tpy
PM _{2.5}	<0.1 pph	0.2 tpy
Sulfur Dioxide (SO ₂)	1.1 tpy	4.8 tpy
Nitrogen Dioxide (NO ₂)	36.3 pph	10.0 tpy
Carbon Monoxide (CO)	26.5 pph	115.9 tpy
Volatile Organic Compounds (VOC)	16.6 pph	46.0 tpy
Total sum of all Hazardous Air Pollutants (HAPs)	12.3 pph	53.1 tpy
Toxic Air Pollutant (TAP)	7.3 pph	32.1 tpy
Ammmonia	7.3 pph	32.1 tpy
Green House Gas Emissions as Total CO ₂ e	n/a	307,117 tpy

The facility may operate up to 24 hours a day, 7 days a week, depending on energy demand.



TOWN OF KIRTLAND RESOLUTION 2025-01 A RESOLUTION CONCERNING GOVERNING BODY MEETINGS AND PUBLIC NOTICE REQUIRED

WHEREAS, the Kirtland Town Council met in regular session in the Council Chambers at 47 Road 6500, Kirtland, New Mexico on January 14, 2025, at 5:00 p.m. as required by law, and

WHEREAS, Section 10-15-1(b) of the Open Meetings Act (OMA) (NMSA 1978, Sections 10-15-1 to 10-15-4) states that, except as may be otherwise provided in the Constitution or the provisions of the of the Open Meetings Act, all meetings of a quorum of members of any board, council, commission, administrative adjudicatory body or other policy-making body of any state or local public agency, held for the purpose of formulating public policy, including development of personnel policy, rules, regulations or ordinances, discussing public business or for the purpose of taking any action within the authority of or the delegated authority of such body, are deemed to be public meetings open to the public at all times, and,

WHEREAS, Section 10-15-1(c) requires that "Any meetings at which the discussion or adoption of any proposed resolution, rule, regulation, or formal action occurs, and at which a majority or quorum of the body is in attendance, and any closed meetings, shall be held only after reasonable notice to the public. The affected body shall determine at least annually in a public meeting what notice for a public meeting shall be reasonable when applied to that body."

WHEREAS, Section 10-15-3(A), NMSA 1978 provides that "No resolution, rule, regulation, ordinance or action of any board, commission, committee or other policymaking body shall be valid unless taken or made at a meeting held in accordance with the requirements of Section 10-15-1 NMSA 1978," and,

WHEREAS, Section 10-15-4, NMSA 1978 provides that "Any person violating any of the provisions of Section 10-15-1 or 10-15-2 NMSA 1978 is guilty of a misdemeanor shall be punished by a fine of not more than five hundred dollars (\$500) for each offense," and,

NOW, THEREFORE, BE IT RESOLVED by the governing body of the Town of Kirtland, New Mexico that:

- All meetings shall be held at Kirtland Town Hall, 47 Road 6500 Kirtland, New Mexico at 5:00 p.m. or as indicated in the meeting notice.
- Unless otherwise specified, regular meetings shall be held each month on the second Tuesday of the month. The agenda will be available at least seventy-two (72) hours prior to the meeting from the Town Clerk located at Kirtland Town Hall, 47 RD 6500.

RESOLUTION 2025-01
Governing Body Meeting and Public Notice Required

Right to Inspect Public Records 2025

These procedures contained in the New Mexico Inspection of Public Records Act, Article 20, Section 20-2, under the Inspection of Public Records Act, give the public the right to inspect public records of the Town. The Act also makes it a crime for any person to obstruct or interfere with the public's right to inspect public records.

A notice of the public's right to inspect public records:

Any person desiring to inspect public records may submit a request to the Town Clerk. However, the procedures and penalties prescribed by the Act apply only to written requests. Responses may be sent to the requestor by email. A written request must contain the name, address and phone number of the requestor. A request must describe the records requested in sufficient detail to enable the records custodian to identify and locate the requested records. A request must also include a justification on why certain records were taken by the Town of Kirtland under this law.

Records may be inspected in person or by email.

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US Post Office, Kirtland

9/5/2025

NOTICE

Saddle Butte Energy Farmington, LLC announces its application to the New Mexico Environment Department for an air quality permit for the construction of its power generation facility. This facility is being developed in collaboration with the Fortymon Electric Utility System to support the local power grid with efficient, reliable, rapidly dispatchable power. The expected date of application submittal to the Air Quality Bureau is September 10, 2025.

The exact location for the proposed facility known as, Westside Station, will be at latitude 38.7819 dec deg North and longitude -108.32210 dec deg West. The approximate location of this facility is 0.75 miles Northwest of the intersection of Rd 680 and Rd 6200 San Juan County.

The proposed construction will consist of installing six (6) four-cylinder 3520 high-efficiency ultra-low emission natural gas-fired engines, ten (10) six-cylinder 3524 high-efficiency ultra-low emission natural gas-fired engines, two (2) 600 kV lines, transformers and natural gas handling equipment.

The estimated maximum quantities of any regulated air contaminants will be as follows in pounds per hour (pph) and tons per year (tpy). These reported emissions could change slightly during the course of the Department's review.

Pollutant	Pounds per hour	Tons per year
Particulate Matter (PM ₁₀)	<0.1 pph	0.3 tpy
PM _{2.5}	<0.1 pph	0.2 tpy
PM _{10-2.5}	<0.1 pph	0.2 tpy
Sulfur Dioxide (SO ₂)	1.1 pph	4.8 tpy
Nitrogen Dioxide (NO ₂)	35.3 pph	158.0 tpy
Carbon Monoxide (CO)	26.5 pph	115.9 tpy
Volatile Organic Compounds (VOC)	10.6 pph	46.6 tpy
Total sum of all Hazardous Air Pollutants (HAPs)	12.3 pph	53.8 tpy
Toxic Air Pollutant (TAP)	7.3 pph	32.1 tpy
Ammonia	7.3 pph	32.1 tpy
Green House Gas Emissions as Total CO ₂ e	n/a	307,117 tpy

The facility may operate up to 24 hours a day, 7 days a week, depending on energy demands.

for American Indian youth suicide prevention. The case managers will provide supports and connections to care workers for all, while implementing brief culturally-informed interventions.

Native National Division of Behavioral & Mental Health Services - Shiprock, NM

505-568-1429 and 505-568-1050
<http://nndbhs.org/dmhs/>

BHS-NMNC Juu Counseling Shiprock, NM

505-568-7102 and 505-568-6091

Native Treatment Center for Children & their Families P.O. Box 460 Shiprock, NM 87420

505-368-1104

Deer View Family Counseling Services Farmington, NM

505-326-7878
www.deerviewcounseling.org

Cottonwood Clinical Services Farmington, NM

505-377-4584
www.cottonwoodclinical.com

Tribal Behavioral Health Farmington, NM

505-564-4804
www.tbhnm.org

San Juan Health Partners Behavioral Health Farmington, NM

505-609-6080
www.sjuhealthpartners.com

Family Crisis Center Farmington, NM

505-325-1549

Choices Counseling Services Farmington, NM

505-325-5321

Angel Peak Counseling Bloomfield, NM

505-330-4220

Lavaca Counseling Services Artes, NM

505-327-7382

Overseas Counseling Farmington, NM

505-377-0292

RESOURCES

The Salvation Army Family Store & Donation Center (clothing, bill paying, employment, clothing, food) 318 W. Anasazi St. Farmington, N.M. 87401

505-325-8661

Goodwill Industries of NM (employment, Veterans) 1861 N. Horton Ave. Farmington, N.M. 87402

505-326-6161

The ARC of San Juan County (clothing) 200 W. Broadway Farmington, N.M. 87401

385-328-6263

Omni Church - The Lord's Pantry (food & clothing) Farmington, N.M. Prayers Ready & Debbie Jaulin

505-325-1727

Riverstone Church (clothing & household items) The Overflow Free Farmington, N.M.

505-327-0363

The Path (emergency shelter, daily meals) Farmington, N.M.

505-327-1104

The Indian Center (military public, showers) Farmington, NM

505-327-6296

San Juan Catholic Charities (emergency assistance, counseling, drop-in center) - Farmington, N.M.

505-325-3734

San Juan United Way - Farmington, N.M. (rent, utilities, shelter, food, counseling, hygiene items, school supplies, transportation)

505-326-1195

Farmington Rio del Sol Khwants Farmington, N.M. 87499

JLE 505-860-5165
505-402-7258

ELCHO Food Bank (holiday food boxes)

505-326-1770

September 5, 2025

Dear Station Manager

Saddle Butte Energy Farmington, LLC is requesting the following public service announcement to be read on air.

“Saddle Butte Energy Farmington, LLC announces its application to the New Mexico Environment Department for an air quality permit for the Construction of its power generation facility. This facility is being developed in collaboration with the Farmington Electric Utility System to support the local power grid with efficient, reliable, rapidly dispatchable power. The proposed construction will consist of installing Six Jenbacher J620 high-efficiency ultra-low emission natural gas-fired engines, Ten Jenbacher J624 high-efficiency ultra-low emission natural gas-fired engines, two lube oil tanks, transformers and natural gas handling equipment.

Public Notices have been posted at the US Post Office, located at 4211 US-64 Kirtland, NM 87417; Town of Kirtland Town Hall located at 47 Rd 6500 Kirtland, NM 87417; Lower Valley Water Users located at 4286 US-64 Kirtland, NM 87417; and near the proposed facility entrance located at 36.7571 degrees North and -108.3222 degrees west.

If you have any comments about the construction or operation of this facility, and you want your comments to be made as part of the permit review process, you must submit your comments in writing to this address: Permit Programs Manager; New Mexico Environment Department; Air Quality Bureau; 525 Camino de los Marquez, Suite 1; Santa Fe, New Mexico; 87505-1816. Other comments and questions may be submitted verbally. (505) 476-4300 or 1-800-224-7009.”

Thank for your consideration of this request.

Sincerely,

Saddle Butte Energy Farmington, LLC
1900 16th St, Suite 200,
Denver CO 80202

FW: Public Service Announcement--Farmington Kirtland Area

From Roland Mora <RMora@sbpipeline.com>

To Cole Dougherty <CDougherty@sbpipeline.com>; Christian Stoddard <CStoddard@sbpipeline.com>; Trent Miller <TMiller@sbpipeline.com>

 2 attachments (70 KB)

Public Service Announcement Westside--Radio.docx; SnipImage.JPG;

I sent the email below to Hutton Broadcasting's sales/advertising department.

I completed the advertising inquiry with iHeart Radio and included the announcement in the comment section of the inquiry asking them to read it on air.

I'll save this email in the Public Announcements folder in the Q drive.

From: Roland Mora

Sent: Friday, September 5, 2025 10:42 AM

To: sales@santafe.com

Subject: Public Service Announcement--Farmington Kirtland Area

Good morning,

Please read the attached public service announcement on the air. Please let me know if you need anything additional from me.

Thank you,

Roland Mora

Saddle Butte Pipeline III, LLC

Land Manager

970-426-9358

rmora@sbpipeline.com



"This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message."

Submittal of Public Service Announcement – Certification

I, Christian Stoddard, the undersigned, certify that on **September 5, 2025**, submitted a public service announcement to Hutton Broadcasting Farmington that serves the town of Kirtland, San Juan County, New Mexico, in which the source is or is proposed to be located and that Hutton Broadcasting Farmington **DID NOT RESPOND** ~~RESPONDED THAT IT WOULD NOT AIR THE ANNOUNCEMENT~~ ~~RESPONDED THAT IT WOULD AIR THE ANNOUNCEMENT~~.

Signed this 8TH day of September, 2025,



Signature

9/8/25
Date

Christian Stoddard

Printed Name

Director of Planning
Title – Director of Planning, Saddle Butte Energy Farmington, LLC



MARKETPLACE

★ EMPLOYMENT

Help Wanted/ Full Time



Ballantine Communications Inc. is seeking a **Multimedia Sales Representative** to join our team! As a Multi-Media Sales Representative, you will present advertising solutions to clients, consult with them about their business objectives, craft high commercial messages, and choose the appropriate marketing channels to connect to the correct demographic group. The likely candidate will be energetic, have a solid understanding of local markets, and proven ability to generate sales by providing creative solutions to clients that meet their business needs. BCI is an equal opportunity employer. Apply at <https://ballantinecommunicationsinc.com/>



SOUTHERN UTE INDIAN TRIBE JOB OPENINGS

Chief of Police
Communications Manager
Community Health Representative
Construction Services Repairman
Controller
Detention Cook
Detention Division Head
Dispatcher - Potential Sign-On Bonus of 3-5k DOE
Early Childhood Teacher
Elementary Teacher
Gaming Director
Gaming Investigator I
Gaming Investigator II
Group Exercise Instructor
Housing Project Administrator
HVAC Technician
Land Surveyor
Lifeguard PT
Patrol Officer I - Potential Sign-On Bonus of 3-5k DOE
Permits & ROW Specialist
Physician
Public Health Nurse
Registered Nurse - Detention
Scorekeeper
Swimming Instructor
Teacher Aide
Tribal Administrative and Operations Director
Umpire / Referee

Apply online: <https://careers.southernute.com/pfund>
Human Resources
(970) 563-4750

TERO – Native American Preference

Help Wanted/ Full Time

CO DNR-Energy & Carbon Management Comm - **Compliance Field Inspector (PHA 54).** Open, competitive, Durango/Cortez area based, O&G exp req. Closes 09/15/25. <http://www.governmentjobs.com/careers/colorado/jobs>

Help Wanted/ Part Time

Are you passionate about making a positive impact in the life of my Mother? I am seeking a dedicated & compassionate caregiver to take care & provide exceptional care for my mother. As a caregiver, you will play a crucial role in supporting my mother who is Elderly. Schedule is 5 days a week & 5 hours per day. Salary is \$30/hr. Apply by contacting me via email George at gwsheets@gmail.com for more details.

Be Your Own Boss Set Your Own Hours

Contractor Subscription Sales

Digital and newspaper subscription sales with commissions up to \$25 for each new start. Events, kiosks, and door-to-door. Earn money at your own pace. Interested individuals can contact: SubscriptionSales@bcimedia.com



Independent Carrier, part-time, needed to early morning newspaper delivery. Great for Stay-At-Home moms, Students, Retirees, morning people, or anyone interested in making extra money. Delivery on Monday, Wednesday, and Friday. Vehicle and valid driver's license required. If interested apply at <http://ballantinecommunicationsinc.com/careers> or email scorwin@bcimedia.com

★ LEGALS

Private Legals

30519
**STATE OF NEW MEXICO
COUNTY OF SAN JUAN
ELEVENTH JUDICIAL
DISTRICT**

**UNITED STATES OF
AMERICA, ACTING
THROUGH THE RURAL
HOUSING SERVICE,**

Plaintiff,

vs.

**THE ESTATE OF RICHARD L.
SAWYERS, DECEASED, AND
THE UNKNOWN HEIRS OF
RICHARD L. SAWYERS,
DECEASED,**

Defendants.

No. D-1116-cv-2025-00334

Private Legals

NOTICE OF PENDENCY OF SUIT

**TO DEFENDANTS THE
ESTATE OF RICHARD L.
SAWYERS, DECEASED, AND
THE UNKNOWN HEIRS OF
RICHARD L. SAWYERS,
DECEASED:**

NOTICE IS HEREBY GIVEN that the above-named Plaintiff filed an In Rem Amended Complaint for Foreclosure in the above Court on May 12, 2025, against the above named Defendants The Estate of Richard L. Sawyers, deceased and The Unknown Heirs of Richard L. Sawyers, deceased. The general object of the In Rem Amended Complaint is to Foreclose a lien of Plaintiff against certain real property located in San Juan County, New Mexico, commonly known as 801 La Plata Avenue, Aztec, NM 87410, and more particularly described as follows:

LOT ONE (1) BLOCK FOUR (4) OF THE ANIMAS HEIGHTS SUBDIVISION, IN THE CITY OF AZTEC, SAN JUAN COUNTY, NEW MEXICO, AS SHOWN ON THE AMENDED PLAT OF SAID SUBDIVISION FILED FOR RECORD MAY 23, 1956,

and to foreclose the interests of the above named Defendant and any other parties bound by the notice of lis pendens in the Property, all as more specifically stated in the Complaint filed in this cause of action.

FURTHER, the above-named Defendants The Estate of Richard L. Sawyers, deceased and The Unknown Heirs of Richard L. Sawyers, deceased, are hereby notified that they have until thirty (30) days from date of completion of publication of this Notice in which to file an answer or other pleading responsive to the Complaint and should said Defendants The Estate of Richard L. Sawyers, deceased and The Unknown Heirs of Richard L. Sawyers, deceased, choose not to file an answer or other responsive pleading to the In Rem Amended Complaint on or before thirty (30) days from date of completion of publication of this Notice, judgment or other appropriate relief may be rendered against the above-named Defendants. Kelley L. Thurston of the law firm of Excelsior Law of New Mexico, whose address and phone number is 2440 Louisiana Blvd NE, Suite 530, Albuquerque, New Mexico 87110, (505) 830-6563 is the attorney for the Plaintiff.

WITNESS the Honorable Bradford J. Dalley, District Judge of the Eleventh Judicial District Court of the State of New Mexico and the Seal of the District Court of said County, on 8/18/2025/

Private Legals

CLERK OF THE DISTRICT COURT

Published in Tri-City Record August 25, September 1, 8, 2025

30546

Attention Qualified Subcontractors

The Navajo Engineering and Construction Authority (NECA) is requesting assistance from qualified subcontractors to provide construction services for bathroom renovation across the Navajo Nation. All interested contractors may contact Jeffrey Jim at 505-568-0933 or email jeffrey@navajo.net.

Preference will be given to Navajo and other Indian-owned firms eligible for priority consideration under the Navajo Nation Business Opportunity Act, N.N.C. Title 5, Chapter 2.

Published in Tri-City Record August 25, 27, 29, September 1, 3, 5, 8, 10, 12, 15, 17, 19, 22, 24, 26, 2025

30711

**STATE OF NEW MEXICO
COUNTY OF SAN JUAN
PROBATE COURT**

**IN THE MATTER OF THE
ESTATE OF ROBERT MAX
GALLEGOS, deceased
Case Number 7499**

NOTICE TO CREDITORS

NOTICE IS HEREBY GIVEN that Ruth Zufelt has been appointed personal representative of this estate. All persons having claims against this estate are required to present their claims within four months after the date of the first publication of this Notice if this Notice is given by publication as provided in Subsection A of NMSA 45-3-801, or within sixty (60) days after the mailing or delivery of this Notice for creditors who are given actual notice as provided by Subsection B of NMSA 45-3-801, whichever is later, or the claims will be forever barred. Claims must be presented either to the undersigned personal representative at PO Box 91658, Albuquerque, NM 87199, or filed with the San Juan County Probate Court.

ROYBAL-MACK & CORDOVA, P.C.

/s/ Scott Aaron
Scott Aaron,
Attorney for Ruth Zufelt
PO Box 91658
Albuquerque NM 87199
(505) 288-3500

Published in Tri-City Record September 8, 15, 22, 2025

30720

NOTICE OF AIR QUALITY PERMIT APPLICATION

Saddle Butte Energy Farmington, LLC announces its application to the New Mexico Environment Department for an

Private Legals

air quality permit for the Construction of its power generation facility. This facility is being developed in collaboration with the Farmington Electric Utility System to support the local power grid with efficient, reliable, rapidly dispatchable power. The expected date of application submittal to the Air Quality Bureau is September 10, 2025.

The exact location for the proposed facility known as, Westside Station, is/will be at latitude 36.7619 dec deg North and longitude -108.32210 dec deg West. The approximate location of this facility is 0.75 miles Northwest of the intersection of Rd 6480 and Rd 6200 San Juan county.

The proposed construction will consist of installing Six (6) Jenbacher J620 high-efficiency ultra-low emission natural gas-fired engines, Ten (10) Jenbacher J624 high-efficiency ultra-low emission natural gas-fired engines, two (2) lube oil tanks, transformers and natural gas handling equipment.

The estimated maximum quantities of any regulated air contaminants will be as follows in pounds per hour (pph) and tons per year (tpy). These reported emissions could change slightly during the course of the Department's review:

Pollutant: Pounds per hour
Tons per year
Particulate Matter (PM) <0.1 pph 0.2 tpy
PM₁₀ <0.1 pph 0.2 tpy
PM_{2.5} <0.1 pph 0.2 tpy
Sulfur Dioxide (SO₂) 1.1 pph 4.8 tpy
Nitrogen Oxides (NO_x) 36.3 pph 159.0 tpy
Carbon Monoxide (CO) 26.5 pph 115.9 tpy
Volatile Organic Compounds (VOC) 10.6 pph 46.6 tpy
Total sum of all Hazardous Air Pollutants (HAPs) 12.3 pph 53.8 tpy
Toxic Air Pollutant (TAP) 7.3 pph 32.1 tpy
Ammonia 7.3 pph 32.1 tpy
Green House Gas Emissions as Total CO₂e n/a 307,117 tpy

The facility may operate up to 24 hours a day, 7 days a week, depending on energy demand.

The owner and/or operator of the Facility is:
Saddle Butte Energy Farmington, LLC
1900 16th St, Suite 200,
Denver CO 80202

If you have any comments about the construction or operation of this facility, and you want your comments to be made as part of the permit review process, you must submit your comments in writing to this address: Permit

Private Legals

Programs Manager; New Mexico Environment Department; Air Quality Bureau; 525 Camino de los Marquez, Suite 1; Santa Fe, New Mexico; 87505-1816. Other comments and questions may be submitted verbally. (505) 476-4300; 1 800 224-7009.

Please refer to the company name and site name, or send a copy of this notice along with your comments, since the Department may have not yet received the permit application. Please include a legible return mailing address with your comments. Once the Department has performed a preliminary review of the application and its air quality impacts, the Department's notice will be published in the legal section of a newspaper circulated near the facility location.

General information about air quality and the permitting process, and links to the regulations can be found at the Air Quality Bureau's website: www.env.nm.gov/air-quality/permitting-section-home-page/. The regulation dealing with public participation in the permit review process is 20.2.72.206 NMAC.

Atención

Este es un aviso de la oficina de Calidad del Aire del Departamento del Medio Ambiente de Nuevo México, acerca de las emisiones producidas por un establecimiento en esta área. Si usted desea información en español, por favor comuníquese con esa oficina al teléfono 505-629-7748.

Notice of Non-Discrimination

NMED does not discriminate on the basis of race, color, national origin, disability, age or sex in the administration of its programs or activities, as required by applicable laws and regulations. NMED is responsible for coordination of compliance efforts and receipt of inquiries concerning non-discrimination requirements implemented by 40 C.F.R. Part

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Private Legals

7, including Title VI of the Civil Rights Act of 1964, as amended; Section 504 of the Rehabilitation Act of 1973; the Age Discrimination Act of 1975, Title IX of the Education Amendments of 1972, and Section 13 of the Federal Water Pollution Control Act Amendments of 1972. If you have any questions about this notice or any of NMED's non-discrimination programs, policies or procedures, or if you believe that you have been discriminated against with respect to a NMED program or activity, you may contact: Non-Discrimination Coordinator, NMED, 1190 St. Francis Dr., Suite N4050, P.O. Box 5469, Santa Fe, NM 87502, (505) 827-2855, nd.coordinator@env.nm.gov. You may also visit our website at <https://www.env.nm.gov/non-employee-discrimination-complaint-page/> to learn how and where to file a complaint of discrimination.

Published in Tri-City Record
September 8, 2025

Public Legals

30664

**REQUEST FOR PROPOSAL –
LEGAL SERVICES FOR
CH'OOSHGAI COMMUNITY
SCHOOL BOARD of
EDUCATION, INC.**

Notice is hereby given that the Ch'ooshgai Community School Board of Education, Inc., McKinley County, New Mexico, will receive proposals from Law Firms to provide LEGAL services for FY 2024-25.

RFPs shall be labeled "LEGAL SERVICES RFP" and can be sent to: Ch'ooshgai Community School, ½ mile E NM HWY 491, P.O. Box 321 Tohatchi, New Mexico 87325. RFPs can also be hand delivered to Ch'ooshgai Community School Administration offices. Any questions regarding the RFP project or proposals shall be directed to the Human Resources office at (505) 733-2725 or School board office @ (505) 733-2701.

The Governing Board reserves the right to reject any or all RFPs.

Published in the Tri-City Record
September 3, 5, 8, 10, 12, 15
and 17, 2025

30689

**Request for Proposals
No. 25-26-05**

San Juan County will accept sealed proposals for an **Insurance Broker until 5:00 p.m. (Local Time), October 8, 2025** at the Central Purchasing Office, 213 S. Oliver, Aztec, NM 87410.

Proposal documents may be obtained by accessing the County web page, www.sjcounty.net or by calling (505) 334-4548.

NIGP Code: 953.52

Published in Tri-City Record
September 8, 2025

Have a News Tip or Story Suggestion?

Contact our Newsroom at 505-592-0182

contact@tricityrecordnm.com

TRI-CITY RECORD



Farmington Police report one injured by syringes on toilet seat

FPD believes that the case is an 'isolated incident,' but asks people to be cautious

BY DEBRA MAYEUX
TRI-CITY RECORD

The Farmington Police Department is investigating an incident in which a 51-year-old man was injured by needles taped to a men's toilet seat in the East Main Walmart, according to spokeswoman Shanice Gonzales.

"We're trying to identify what substance was in the syringes," Gonzales said, adding it wasn't a "hoax" and the investigation was ongoing.

Medical professionals treated the man's injuries, she said. The *Tri-City Record* has requested a police report and does not yet know when the injury occurred. Police posted the notice on Facebook at 6:20 p.m. Saturday, according to the timestamp.

While police believe this is an "isolated incident," Gonzales said it is important for people to be cautious and inspect public restrooms before use.



Courtesy of Farmington Police Department

Syringes are taped to a toilet in the men's restroom at the East Main Walmart in Farmington in this photo released by Farmington Police Department.

Anyone with additional information or who witnesses suspicious activity is asked to call nonemergency dispatch at (505) 334-6622.

NOTICE OF AIR QUALITY PERMIT APPLICATION

Saddle Butte Energy Farmington, LLC announces its application to the New Mexico Environment Department for an air quality permit for the Construction of its power generation facility. This facility is being developed in collaboration with the Farmington Electric Utility System to support the local power grid with efficient, reliable, rapidly dispatchable power. The expected date of application submittal to the Air Quality Bureau is September 10, 2025.

The exact location for the proposed facility known as, Westside Station, is/will be at latitude 36.7619 dec deg North and longitude -108.32210 dec deg West. The approximate location of this facility is 0.75 miles Northwest of the intersection of Rd 6480 and Rd 6200 San Juan county.

The proposed construction will consist of installing Six (6) Jenbacher J620 high-efficiency ultra-low emission natural gas-fired engines, Ten (10) Jenbacher J624 high-efficiency ultra-low emission natural gas-fired engines, two (2) lube oil tanks, transformers and natural gas handling equipment.

The estimated maximum quantities of any regulated air contaminants will be as follows in pounds per hour (pph) and tons per year (tpy). These reported emissions could change slightly during the course of the Department's review:

POLLUTANT:	POUNDS PER HOUR	TONS PER YEAR
PARTICULATE MATTER (PM)	<0.1	0.2
PM 10	<0.1	0.2
PM 2.5	<0.1	0.2
SULFUR DIOXIDE (SO ₂)	1.1	4.8
NITROGEN OXIDES (NO _x)	36.3	159.0
CARBON MONOXIDE (CO)	26.5	115.9
VOLATILE ORGANIC COMPOUNDS (VOC)	10.6	46.6
TOTAL SUM OF ALL HAZARDOUS AIR POLLUTANTS (HAPS)	12.3	53.8
TOXIC AIR POLLUTANT (TAP)	7.3	32.1
AMMONIA	7.3	32.1
GREEN HOUSE GAS EMISSIONS AS TOTAL CO ₂ e	N/A	307,117

The facility may operate up to 24 hours a day, 7 days a week, depending on energy demand.

The owner and/or operator of the Facility is: Saddle Butte Energy Farmington, LLC 1900 16th St, Suite 200, Denver CO 80202 If you have any comments about the construction or operation of this facility, and you want your comments to be made as part of the permit review process, you must submit your comments in writing to this address: Permit Programs Manager; New Mexico Environment Department; Air Quality Bureau; 525 Camino de los Marquez, Suite 1; Santa Fe, New Mexico; 87505-1816. Other comments and questions may be submitted verbally. (505) 476-4300; 1 800 224-7009.

Please refer to the company name and site name, or send a copy of this notice along with your comments, since the Department may have not yet received the permit application. Please include a legible return mailing address with your comments. Once the Department has performed a preliminary review of the application and its air quality impacts, the Department's notice will be published in the legal section of a newspaper circulated near the facility location.

General information about air quality and the permitting process, and links to the regulations can be found at the Air Quality Bureau's website: www.env.nm.gov/air-quality/permitting-section-home-page/. The regulation dealing with public participation in the permit review process is 20.2.72.206 NMAC.

Atención

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41st COLLECTOR CAR WEEKEND

Car Show • Sunday, Sept. 14, 2025

BROOKSIDE PARK • FARMINGTON, NEW MEXICO

9:00 A.M. – 3:00 P.M. Parking begins at 8 am • Awards at 3 pm





CRUISE IN

Fri., Sept. 12 • 6:30 to 8:30 p.m.
Sonic on East Main Street
(Registration will be available)

SWAP MEET

Sat., Sept. 13 • 8:00 a.m. - noon
San Juan Plaza - E. Main St.
(Registration will be available)
Info: Phil (505) 609-3547 Ben (505) 947-0355

CAR SHOW

Sun., Sept. 14 • 9:00 a.m. - 3:00 p.m.
Brookside Park • Farmington, NM

27 CLASSES

Classes from 1900 to 2025
Several Special Awards & Door Prizes

RAFFLE & SILENT AUCTION

Raffle Drawing Sunday during Awards Ceremony
Silent Auction ends at 2:00 p.m.

MUSIC

Epic Entertainment!

FOOD CONCESSIONS

HOST HOTEL

Comfort Suites Farmington (505) 325-9414

**MEET TEAM SHELBY
ROCKY MOUNTAIN REGION**

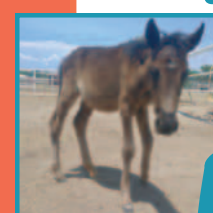
— Peoples Choice Award —

Support Operation Second Chance Adventures by voting for your favorite vehicle — \$1.00 per vote
FOR MORE INFO- Phil (505) 609-3547 or Kevin (262) 496-7001



FOUR CORNERS EQUINE RESCUE

HUG A HORSE DAY





Lunch served from 12-1pm

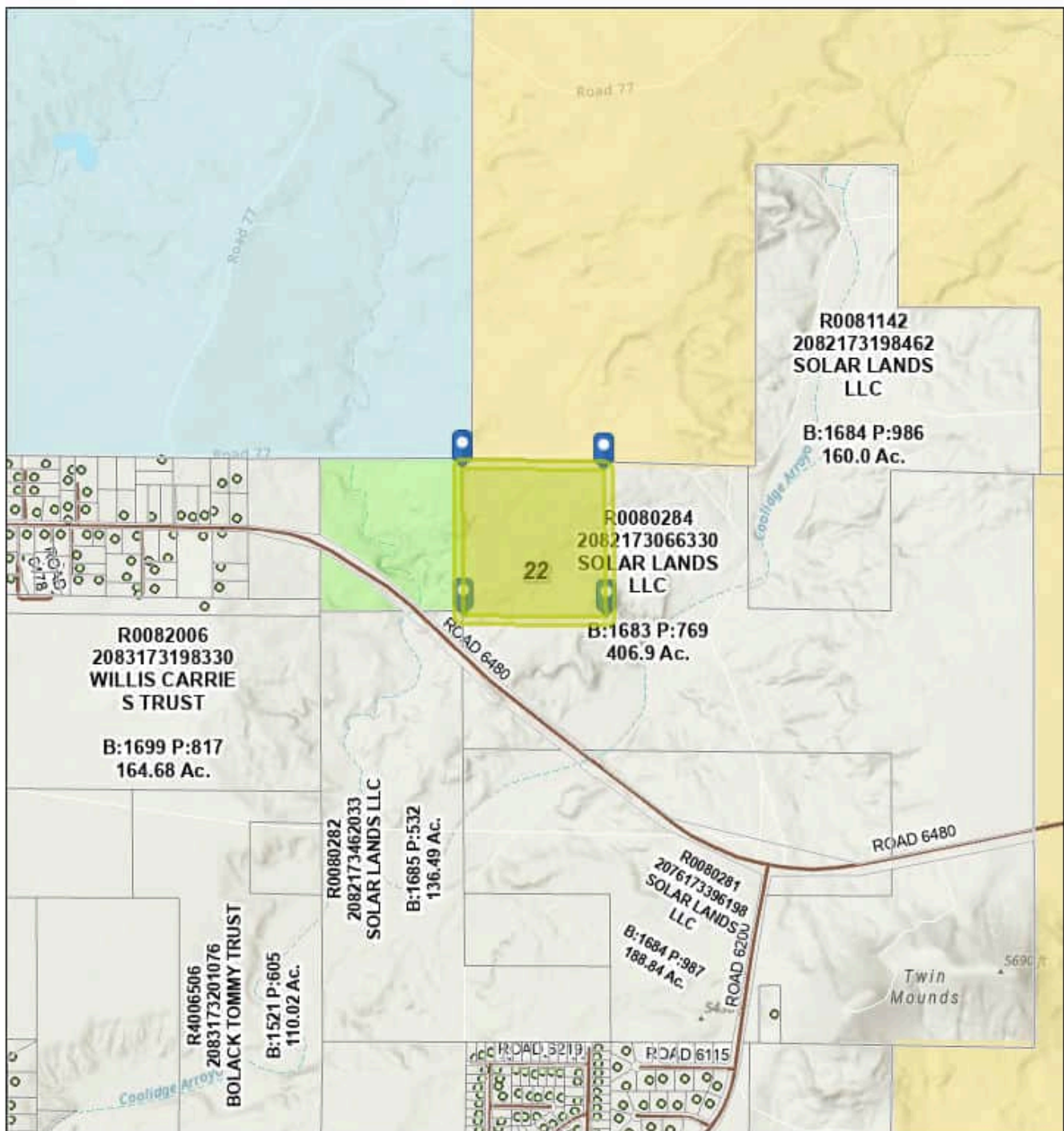
Demos

Adoptable Horse Showcase

Barn Tours

SEPT 13 10AM-2PM
22 Road 3334, Aztec, NM 87410

For more information visit: fourcornersequinrescue.org



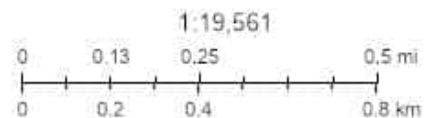
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Addresses_20250730



San Juan County, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, MET/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, USFWS, Esri, NASA, NGA, USGS, FEMA

Section 10

Written Description of the Routine Operations of the Facility

A written description of the routine operations of the facility. Include a description of how each piece of equipment will be operated, how controls will be used, and the fate of both the products and waste generated. For modifications and/or revisions, explain how the changes will affect the existing process. In a separate paragraph describe the major process bottlenecks that limit production. The purpose of this description is to provide sufficient information about plant operations for the permit writer to determine appropriate emission sources.

Westside Station (or facility) will generate power by utilizing the following natural gas-fired lean burn engines:

- Six (6) Jenbacher J620 4-Stroke Lean Burn engines each rated 4,581 brake-horsepower (bhp)
- Ten (10) Jenbacher JMC624 4-Stroke Lean Burn engines each rated 6,161 bhp

The engines will be equipped with oxidation catalysts to control carbon monoxide (CO), volatile organic compounds (VOC), formaldehyde, and other hazardous air pollutants (HAP) emissions. Additionally, the engines will be equipped with selective catalytic reduction (SCR) to control nitrogen oxides (NO_x). Each engine may operate up to 8,760 hours per year.

Westside Station will provide electricity to the power grid during periods of peak demand.

Section 11

Source Determination

Source submitting under 20.2.70, 20.2.72, 20.2.73, and 20.2.74 NMAC

Sources applying for a construction permit, PSD permit, or operating permit shall evaluate surrounding and/or associated sources (including those sources directly connected to this source for business reasons) and complete this section. Responses to the following questions shall be consistent with the Air Quality Bureau's permitting guidance, Single Source Determination Guidance, which may be found on the Applications Page in the Permitting Section of the Air Quality Bureau website.

Typically, buildings, structures, installations, or facilities that have the same SIC code, that are under common ownership or control, and that are contiguous or adjacent constitute a single stationary source for 20.2.70, 20.2.72, 20.2.73, and 20.2.74 NMAC applicability purposes. Submission of your analysis of these factors in support of the responses below is optional, unless requested by NMED.

A. Identify the emission sources evaluated in this section (list and describe):

Please refer to Section 2, Table 2-A.

B. Apply the 3 criteria for determining a single source:

SIC Code: Surrounding or associated sources belong to the same 2-digit industrial grouping (2-digit SIC code) as this facility, OR surrounding or associated sources that belong to different 2-digit SIC codes are support facilities for this source.

☒ Yes ☐ No

Common Ownership or Control: Surrounding or associated sources are under common ownership or control as this source.

☒ Yes ☐ No

Contiguous or Adjacent: Surrounding or associated sources are contiguous or adjacent with this source.

☒ Yes ☐ No

C. Make a determination:

- ☒ The source, as described in this application, constitutes the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes. If in "A" above you evaluated only the source that is the subject of this application, all "YES" boxes should be checked. If in "A" above you evaluated other sources as well, you must check **AT LEAST ONE** of the boxes "NO" to conclude that the source, as described in the application, is the entire source for 20.2.70, 20.2.72, 20.2.73, and 20.2.74 NMAC applicability purposes.
- ☐ The source, as described in this application, **does not** constitute the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes (A permit may be issued for a portion of a source). The entire source consists of the following facilities or emissions sources (list and describe):

Section 12

Section 12.A

PSD Applicability Determination for All Sources

(Submitting under 20.2.72, 20.2.74 NMAC)

A PSD applicability determination for all sources. For sources applying for a significant permit revision, apply the applicable requirements of 20.2.74.AG and 20.2.74.200 NMAC and to determine whether this facility is a major or minor PSD source, and whether this modification is a major or a minor PSD modification. It may be helpful to refer to the procedures for Determining the Net Emissions Change at a Source as specified by Table A-5 (Page A.45) of the EPA New Source Review Workshop Manual to determine if the revision is subject to PSD review.

A. This facility is:

- ☒ a minor PSD source before and after this modification (if so, delete C and D below).
- ☐ a major PSD source before this modification. This modification will make this a PSD minor source.
- ☐ an existing PSD Major Source that has never had a major modification requiring a BACT analysis.
- ☐ an existing PSD Major Source that has had a major modification requiring a BACT analysis
- ☐ a new PSD Major Source after this modification.

B. This facility **is not** one of the listed 20.2.74.501 Table I – PSD Source Categories. The “project” emissions for this modification are **. The facility has the potential to emit less than 250 tons per year for all criteria pollutants.** The “project” emissions listed below **do** only result from changes described in this permit application, thus no emissions from other **revisions or modifications, past or future** to this facility. A The project emissions (before netting) for this project are as follows :

- a. NOx: **159.9 TPY**
- b. CO: **115.9 TPY**
- c. VOC: **46.6 TPY**
- d. SOx: **4.8 TPY**
- e. PM: **21.7 TPY**
- f. PM10: **21.7 TPY**
- g. PM2.5: **21.7 TPY**
- h. Fluorides: **0.0 TPY**
- i. Lead: **0.0 TPY**
- j. Sulfur compounds (listed in Table 2): **0.0 TPY**
- k. GHG: **307,117.0 TPY**

C. Netting **is not required, as the proposed facility will be a minor source.**

D. BACT **is not required for this modification, as this application is a minor source**

E. If this is an existing PSD major source, or any facility with emissions greater than 250 TPY (or 100 TPY for 20.2.74.501 Table 1 – PSD Source Categories), determine whether any permit modifications are related, or could be considered a single project with this action, and provide an explanation for your determination whether a PSD modification is triggered.

Section 13

Determination of State & Federal Air Quality Regulations

This section lists each state and federal air quality regulation that may apply to your facility and/or equipment that are stationary sources of regulated air pollutants.

Not all state and federal air quality regulations are included in this list. Go to the Code of Federal Regulations (CFR) or to the Air Quality Bureau's regulation page to see the full set of air quality regulations.

Required Information for Specific Equipment:

For regulations that apply to specific source types, in the 'Justification' column **provide any information needed to determine if the regulation does or does not apply. For example**, to determine if emissions standards at 40 CFR 60, Subpart IIII apply to your three identical stationary engines, we need to know the construction date as defined in that regulation; the manufacturer date; the date of reconstruction or modification, if any; if they are or are not fire pump engines; if they are or are not emergency engines as defined in that regulation; their site ratings; and the cylinder displacement.

Required Information for Regulations that Apply to the Entire Facility:

See instructions in the 'Justification' column for the information that is needed to determine if an 'Entire Facility' type of regulation applies (e.g. 20.2.70 or 20.2.73 NMAC).

Regulatory Citations for Regulations That Do Not, but Could Apply:

If there is a state or federal air quality regulation that does not apply, but you have a piece of equipment in a source category for which a regulation has been promulgated, you must **provide the low level regulatory citation showing why your piece of equipment is not subject to or exempt from the regulation. For example** if you have a stationary internal combustion engine that is not subject to 40 CFR 63, Subpart ZZZZ because it is an existing 2 stroke lean burn stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, your citation would be 40 CFR 63.6590(b)(3)(i). **We don't want a discussion of every non-applicable regulation, but if it is possible a regulation could apply, explain why it does not. For example**, if your facility is a power plant, you do not need to include a citation to show that 40 CFR 60, Subpart OOO does not apply to your non-existent rock crusher.

Regulatory Citations for Emission Standards:

For each unit that is subject to an emission standard in a source specific regulation, such as 40 CFR 60, Subpart OOO or 40 CFR 63, Subpart HH, include the low level regulatory citation of that emission standard. Emission standards can be numerical emission limits, work practice standards, or other requirements such as maintenance. **Here are examples:** a glycol dehydrator is subject to the general standards at 63.764C(1)(i) through (iii); an engine is subject to 63.6601, Tables 2a and 2b; a crusher is subject to 60.672(b), Table 3 and all transfer points are subject to 60.672(e)(1)

Federally Enforceable Conditions:

All federal regulations are federally enforceable. All Air Quality Bureau State regulations are federally enforceable except for the following: affirmative defense portions at 20.2.7.6.B, 20.2.7.110(B)(15), 20.2.7.11 through 20.2.7.113, 20.2.7.115, and 20.2.7.116; 20.2.37; 20.2.42; 20.2.43; 20.2.62; 20.2.63; 20.2.86; 20.2.89; and 20.2.90 NMAC. Federally enforceable means that EPA can enforce the regulation as well as the Air Quality Bureau and federally enforceable regulations can count toward determining a facility's potential to emit (PTE) for the Title V, PSD, and nonattainment permit regulations.

INCLUDE ANY OTHER INFORMATION NEEDED TO COMPLETE AN APPLICABILITY DETERMINATION OR THAT IS RELEVANT TO YOUR FACILITY'S NOTICE OF INTENT OR PERMIT.

EPA Applicability Determination Index for 40 CFR 60, 61, 63, etc: <http://cfpub.epa.gov/adi/>

Table for State Regulations:

<u>State Regulation Citation</u>	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification: (You may delete instructions or statements that do not apply in the justification column to shorten the document.)
20.2.1 NMAC	General Provisions	Yes	Facility	General Provisions apply to Notice of Intent, Construction, and Title V permit applications.
20.2.3 NMAC	Ambient Air Quality Standards NMAAQS	Yes	Facility	This is a State Implementation Plan (SIP) approved regulation that limits the maximum allowable concentration of Sulfur Compounds, Carbon Monoxide and Nitrogen Dioxide. These requirements are not applicable under 20.2.70 NMAC (see 20.2.70.202.B NMAC)
20.2.7 NMAC	Excess Emissions	Yes	Facility	This regulation is applicable because it prohibits excess emissions unless proper notification procedures are followed.
20.2.8 NMAC	Emissions Leaving New Mexico	Yes	Facility	This regulation is applicable because it prohibits the release of pollutants that cross New Mexico State boundaries.
20.2.23 NMAC	Fugitive Dust Control	No	N/A	This regulation does not apply because this application is not for a Notice of Intent.
20.2.33 NMAC	Gas Burning Equipment - Nitrogen Dioxide	No	N/A	The engines are considered new fuel-burning equipment because they will commence construction after February 17, 1972. However, there are no applicable requirements because each engine has a heat input of less than 1,000,000 MMBtu/yr.
20.2.34 NMAC	Oil Burning Equipment: NO ₂	No	N/A	This regulation is not applicable because the facility will be equipped only with internal combustion engines and will not burn oil.
20.2.35 NMAC	Natural Gas Processing Plant – Sulfur	No	N/A	This regulation does not apply because the facility will not be a natural gas processing plant.
20.2.37 and 20.2.36 NMAC	Petroleum Processing Facilities and Petroleum Refineries	N/A	N/A	These regulations were repealed by the Environmental Improvement Board. If you had equipment subject to 20.2.37 NMAC before the repeal, your combustion emission sources are now subject to 20.2.61 NMAC.
20.2.38 NMAC	Hydrocarbon Storage Facility	No	N/A	This regulation is not applicable because the facility will not store hydrocarbons containing hydrogen sulfide.
20.2.39 NMAC	Sulfur Recovery Plant - Sulfur	No	N/A	This regulation is not applicable because the facility will not be a sulfur recovery plant.
20.2.50 NMAC	Oil and Gas Sector – Ozone Precursor Pollutants	No	N/A	This regulation establishes emission standards for volatile organic compounds (VOC) and oxides of nitrogen (NO_x) for oil and gas production, processing, compression, and transmission sources. 20.2.50 NMAC subparts below: Include the construction status of applicable units as “New”, “Existing”, “Relocation of Existing”, or “Reconstructed” as defined by this Part in your justification: Check the box for the subparts that are applicable: ☐ 113 – Engines and Turbines ☐ 114 – Compressor Seals ☐ 115 – Control Devices and Closed Vent Systems ☐ 116 – Equipment Leaks and Fugitive Emissions ☐ 117 – Natural Gas Well Liquid Unloading ☐ 118 – Glycol Dehydrators ☐ 119 – Heaters ☐ 120 – Hydrocarbon Liquid Transfers ☐ 121 – Pig Launching and Receiving ☐ 122 – Pneumatic Controllers and Pumps ☐ 123 – Storage Vessels ☐ 124 – Well Workovers ☐ 125 – Small Business Facilities

State Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification: (You may delete instructions or statements that do not apply in the justification column to shorten the document.)
				☐ 126 – Produced Water Management Unit ☐ 127 – Flowback Vessels and Preproduction Operations The facility is not subject because it is not considered a well site, tank batteru, gathering and boosting station, natural gas processing plant, or transmission compressor station.
20.2.61.109 NMAC	Smoke & Visible Emissions	Yes	E-1 to E-16	This regulation is applicable because the facility will be equipped with stationary internal combustion engines. The emissions from the engines are limited to less than 20% opacity per 20.2.61.109 NMAC.
20.2.70 NMAC	Operating Permits	Yes	Facility	This regulation is applicable because the facility will be considered a major source for Title V and HAP. The facility will apply for an operating permit to demonstrate compliance with the requirements of this regulation within twelve months of commencing operation.
20.2.71 NMAC	Operating Permit Fees	Yes	Facility	This regulation establishes an operating permit emission fee schedule. This regulation is applicable because the facility is subject to 20.2.70 NMAC.
20.2.72 NMAC	Construction Permits	Yes	Facility	This regulation established the requirements for obtaining a construction permit. The facility will be a stationary source that has the potential to emit greater than 10 pounds per hour or 25 tons per year of regulated air contaminants for which there are National or New Mexico Air Quality Standards. The facility is applying for a construction permit in this application to meet the requirements of this regulation,
20.2.73 NMAC	NOI & Emissions Inventory Requirements	Yes	Facility	All facilities that are a Title V Major Source as defined at 20.2.70.7.R NMAC, are subject to Emissions Inventory Reporting; therefore, the requirements of this regulation are applicable to the facility.
20.2.74 NMAC	Permits – Prevention of Significant Deterioration (PSD)	No	N/A	Minor NSR Exemptions at 20.2.72.200 NMAC nor Title V Insignificant Activities do not apply to the PSD permit regulation. This facility will be considered a PSD Minor Source, and therefore, is not subject to the requirements of this regulation.
20.2.75 NMAC	Construction Permit Fees	Yes	Facility	This regulation is applicable because the facility is subject to 20.2.72 NMAC.
20.2.77 NMAC	New Source Performance	Yes	E-1 to E-16	This is a stationary source which is subject to the requirements of 40 CFR Part 60 Subpart JJJJ.
20.2.78 NMAC	Emission Standards for HAPS	Yes	E-1 to E-16	This facility emits hazardous air pollutants which are subject to the requirements of 40 CFR Part 61 Subpart ZZZZ.
20.2.79 NMAC	Permits – Nonattainment Areas	No	N/A	This regulation is not applicable because the facility will not be located in a nonattainment area nor will it have a significant impact on a nonattainment area.
20.2.80 NMAC	Stack Heights	Yes	E-1 to E-16	This regulation is applicable because it establishes guidelines for the selection of appropriate stack heights for the purposes of atmospheric dispersion modeling.

State Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification: (You may delete instructions or statements that do not apply in the justification column to shorten the document.)
20.2.82 NMAC	MACT Standards for source categories of HAPS	Yes	E-1 to E-16	This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 63. This facility is subject to 40 CFR Part 63 Subpart ZZZZ, and therefore, is subject to the requirements of 20.2.82 NMAC.
20.2.84 NMAC	Acid Rain Permits	No	N/A	This regulation is not applicable because the facility will be a new utility unit that will serve during the entire year one or more generators with total nameplate capacity of 25 Mwe or less, will burn fuel that does not contain any coal or coal-derived fuel, and will burn gaseous fuel with an average sulfur content of 0.05 percent or less by weight, see 40 CFR Part 72.7(a).
20.2.86 NMAC	BACT for Mercury at New Power Plants	No	N/A	This regulation does not apply because the facility is not a coal-fired power plant.
20.2.89 NMAC	Qualified Generating Facility Certification	No	N/A	This regulation does not apply because it does not meet the definition of a Qualified Generating facility and is anticipating commencing construction after December 31, 2015.
20.2.101 NMAC	Carbon Dioxide Emission Standards for Coal-Fired Electric Generating Facilities	No	N/A	This regulation does not apply because the facility does not use coal as a fuel source.

Table for Applicable Federal Regulations:

<u>Federal Regulation Citation</u>	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
40 CFR 50	NAAQS	Yes	Facility	This regulation is applicable because the facility is subject to 20.2.70 NMAC and 20.2.72 NMAC.
NSPS 40 CFR 60, Subpart A	General Provisions	Yes	E-1 to E-16	This regulation applies if any other Subpart in 40 CFR Part 60 applies. This facility is subject to 40 CFR Part 60 Subpart JJJJ, and therefore, is subject to the requirements of 40 CFR Part 60 Subpart A.
NSPS 40 CFR 60.40a, Subpart Da	Subpart Da, Performance Standards for Electric Utility Steam Generating Units	No	N/A	This regulation establishes standards for electric utility steam generating units that are capable of combusting more than 73 megawatts (MW) (250 million British thermal units per hour (MMBtu/hr)) heat input of fossil fuel (either alone or in combination with any other fuel) and were constructed, modified, or reconstructed after September 18, 1978. The facility is not equipped with fossil-fuel-fired generating units with heat input rates greater than the threshold capacity of 250 MMBtu/hr (40 CFR 60.40Da(a)); therefore, the subpart does not apply.
NSPS 40 CFR 60.40b Subpart Db	Electric Utility Steam Generating Units	No	N/A	This regulation establishes standards for steam generating units which were constructed, modified, or reconstructed after June 19, 1984, and that have a heat input capacity from fuels combusted in the steam generating unit of greater than 29 MW (100 million Btu/hour). This regulation is not applicable because the facility will not have units subject to this subpart.
40 CFR 60.40c, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	No	N/A	This regulation establishes standards for steam generating units which were constructed, modified, or reconstructed after June 9, 1989 that have a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/hr)) or less, but greater than or equal to 2.9 MW (10 MMBtu/hr). This regulation is not applicable because the facility is not equipped with steam generating units with heat inputs greater than 10 MMBtu/hr but less than or equal to 100 MMBtu/hr.
NSPS 40 CFR 60, Subpart Ka	Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984	No	N/A	This regulation is not applicable because the facility will not have petroleum storage tanks with capacities equal to or greater than 151,416 liters (40,000 gallons) for which construction, reconstruction, or modification commenced after May 18, 1978, and prior to July 23, 1984.
NSPS 40 CFR 60, Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction,	No	N/A	This regulation is not applicable because the facility will not have storage vessels with a capacity greater than or equal to 75 cubic meters (m ³) for use of storing volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.

<u>Federal Regulation Citation</u>	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
	Reconstruction, or Modification Commenced After July 23, 1984 and on or before to October 4, 2023			
NSPS 40 CFR 60, Subpart Kc	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After October 4, 2023	No	N/A	This regulation is not applicable because the facility will not have storage vessels with a capacity greater than or equal to 20,000 gallons for use of storing volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.
NSPS 40 CFR Part 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	Yes	E-1 to E-16	This regulation is applicable because the facility has natural gas-fired engines all of which were or will be manufactured after July 1, 2007, each rated greater than 1,350 hp, see 40 CFR 60.4230(a)(4)(i). The facility engines will comply with the NO _x , CO, and VOC emission standards in Table 1 to Subpart JJJJ of Part 60 for Non-Emergency SI Lean Burn engines rated greater than 500 hp based on manufacture date. Note that E-1 through E-6 will be modified engines under this subpart and E-7 through E-16 will be new.
NSPS 40 CFR 60 Subpart TTTT	Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units	No	N/A	This regulation is not applicable because there are no steam generating units, integrated gasification combined cycle (IGCC) units or stationary combustion turbines onsite.
NSPS 40 CFR 60 Subpart TTTTa	Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units	No	N/A	This regulation is not applicable because there are no steam generating units, integrated gasification combined cycle (IGCC) units or stationary combustion turbines onsite.
NSPS 40 CFR 60 Subpart UUUUb	Emissions Guidelines for Greenhouse Gas Emissions and Compliance Times for Electric Utility Generating Units	No	N/A	This regulation is not applicable because there are no steam generating units onsite.
NESHAP 40 CFR 61 Subpart A	General Provisions	No	N/A	The facility is exempt from the requirements of this subpart because there are no applicable 40 CFR 61 subparts
NESHAP 40 CFR 61 Subpart E	National Emission Standards for Mercury	No	N/A	This subpart is not applicable because the facility will not process mercury ore to recover mercury, use mercury chlor-alkali cells to produce chlorine gas and alkali metal hydroxide, or process wastewater treatment plant sludge.
MACT 40 CFR 63, Subpart A	General Provisions	Yes	E-1 to E-16	This regulation is applicable because the facility is subject to 40 CFR Part 63 Subpart ZZZZ.
MACT 40 CFR 63 Subpart UUUUU	National Emission Standards for Hazardous Air Pollutants Coal & Oil Fire Electric	No	N/A	This regulation is not applicable because the facility will not be equipped with electric utility steam generating units which are coal-fired nor oil-fired.

<u>Federal Regulation Citation</u>	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
	Utility Steam Generating Unit			
MACT 40 CFR 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT)	Yes	E-1 to E-16	This regulation is applicable because the facility will operate stationary reciprocating internal combustion engines (RICE) and will be a major source of HAP emissions.
40 CFR 64	Compliance Assurance Monitoring	No	N/A	This regulation is not applicable because the facility will be subject to emission limitation or standards under NSPS (40 CFR 60 Subpart JJJJ) and/or NESHAP (40 CFR 63 Subpart ZZZZ) which were proposed after November 15, 1990.
40 CFR 68	Chemical Accident Prevention	No	N/A	This regulation is not applicable because the facility will not store any of the identified substances in quantities exceeding the thresholds outlined in this subpart.
Title IV – Acid Rain 40 CFR 72	Acid Rain	No	N/A	This regulation is not applicable because the facility will be a new utility unit that will serve during the entire year one or more generators with total nameplate capacity of 25 Mwe or less, will burn fuel that does not contain any coal or coal-derived fuel, and will burn gaseous fuel with an average sulfur content of 0.05 percent or less by weight, see 40 CFR Part 72.7(a).
Title IV – Acid Rain 40 CFR 73	Sulfur Dioxide Allowance Emissions	No	N/A	This regulation is not applicable because this facility is considered a unit for which there is an exemption under 40 CFR Part 72.7 in effect, see 40 CFR Part 72.6(b)(9).
Title IV-Acid Rain 40 CFR 75	Continuous Emissions Monitoring	No	N/A	This regulation is not applicable because this facility is considered a unit for which there is an exemption under 40 CFR Part 72.7 in effect, see 40 CFR Part 75.2(b)(1).
Title IV – Acid Rain 40 CFR 76	Acid Rain Nitrogen Oxides Emission Reduction Program	No	N/A	This regulation is not applicable because the facility is not a coal-fired utility unit, coal-fired substitution unit, or compensating unit, see 40 CFR Part 76.1.
Title VI – 40 CFR 82	Protection of Stratospheric Ozone	No	N/A	This regulation is not applicable because the facility will not produce, transform, destroy, import, or export any ozone-depleting substances. The facility will not maintain or service motor vehicle air conditioning units or refrigeration equipment. The facility will not sell, distribute, or offer for sale or distribution of any product containing ozone-depleting substances.

Section 14

Operational Plan to Mitigate Emissions

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

- ☐ **Title V Sources** (20.2.70 NMAC): By checking this box and certifying this application the permittee certifies that it has developed an **Operational Plan to Mitigate Emissions During Startups, Shutdowns, and Emergencies** defining the measures to be taken to mitigate source emissions during startups, shutdowns, and emergencies as required by 20.2.70.300.D.5(f) and (g) NMAC. This plan shall be kept on site to be made available to the Department upon request. This plan should not be submitted with this application.
- ☒ **NSR** (20.2.72 NMAC), **PSD** (20.2.74 NMAC) & **Nonattainment** (20.2.79 NMAC) **Sources:** By checking this box and certifying this application the permittee certifies that it has developed an **Operational Plan to Mitigate Source Emissions During Malfunction, Startup, or Shutdown** defining the measures to be taken to mitigate source emissions during malfunction, startup, or shutdown as required by 20.2.72.203.A.5 NMAC. This plan shall be kept on site to be made available to the Department upon request. This plan should not be submitted with this application.
- ☒ **Title V** (20.2.70 NMAC), **NSR** (20.2.72 NMAC), **PSD** (20.2.74 NMAC) & **Nonattainment** (20.2.79 NMAC) **Sources:** By checking this box and certifying this application the permittee certifies that it has established and implemented a Plan to Minimize Emissions During Routine or Predictable Startup, Shutdown, and Scheduled Maintenance through work practice standards and good air pollution control practices as required by 20.2.7.14.A and B NMAC. This plan shall be kept on site or at the nearest field office to be made available to the Department upon request. This plan should not be submitted with this application.
-

Section 15

Alternative Operating Scenarios

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

Alternative Operating Scenarios: Provide all information required by the department to define alternative operating scenarios. This includes process, material and product changes; facility emissions information; air pollution control equipment requirements; any applicable requirements; monitoring, recordkeeping, and reporting requirements; and compliance certification requirements. Please ensure applicable Tables in this application are clearly marked to show alternative operating scenario.

Construction Scenarios: When a permit is modified authorizing new construction to an existing facility, NMED includes a condition to clearly address which permit condition(s) (from the previous permit and the new permit) govern during the interval between the date of issuance of the modification permit and the completion of construction of the modification(s). There are many possible variables that need to be addressed such as: Is simultaneous operation of the old and new units permitted and, if so for example, for how long and under what restraints? In general, these types of requirements will be addressed in Section A100 of the permit, but additional requirements may be added elsewhere. Look in A100 of our NSR and/or TV permit template for sample language dealing with these requirements. Find these permit templates at: www.env.nm.gov/air-quality/permitting-section-procedures-and-guidance/. Compliance with standards must be maintained during construction, which should not usually be a problem unless simultaneous operation of old and new equipment is requested.

In this section, under the bolded title “Construction Scenarios”, specify any information necessary to write these conditions, such as: conservative-realistic estimated time for completion of construction of the various units, whether simultaneous operation of old and new units is being requested (and, if so, modeled), whether the old units will be removed or decommissioned, any PSD ramifications, any temporary limits requested during phased construction, whether any increase in emissions is being requested as SSM emissions or will instead be handled as a separate Construction Scenario (with corresponding emission limits and conditions, etc.

There are no alternate operating scenarios at this facility.

Section 16

Air Dispersion Modeling

- 1) Minor Source Construction (20.2.72 NMAC) and Prevention of Significant Deterioration (PSD) (20.2.74 NMAC) ambient impact analysis (modeling): Provide an ambient impact analysis as required at 20.2.72.203.A(4) and/or 20.2.74.303 NMAC and as outlined in the Air Quality Bureau's Dispersion Modeling Guidelines found on the Planning Section's modeling website. If air dispersion modeling has been waived for one or more pollutants, attach the AQB Modeling Section modeling waiver approval documentation.
- 2) SSM Modeling: Applicants must conduct dispersion modeling for the total short term emissions during routine or predictable startup, shutdown, or maintenance (SSM) using realistic worst case scenarios following guidance from the Air Quality Bureau's dispersion modeling section. Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (http://www.env.nm.gov/aqb/permit/app_form.html) for more detailed instructions on SSM emissions modeling requirements.
- 3) Title V (20.2.70 NMAC) ambient impact analysis: Title V applications must specify the construction permit and/or Title V Permit number(s) for which air quality dispersion modeling was last approved. Facilities that have only a Title V permit, such as landfills and air curtain incinerators, are subject to the same modeling required for preconstruction permits required by 20.2.72 and 20.2.74 NMAC.

What is the purpose of this application?	Enter an X for each purpose that applies
New PSD major source or PSD major modification (20.2.74 NMAC). See #1 above.	
New Minor Source or significant permit revision under 20.2.72 NMAC (20.2.72.219.D NMAC). See #1 above. Note: Neither modeling nor a modeling waiver is required for VOC emissions.	X
Reporting existing pollutants that were not previously reported.	
Reporting existing pollutants where the ambient impact is being addressed for the first time.	
Title V application (new, renewal, significant, or minor modification. 20.2.70 NMAC). See #3 above.	
Relocation (20.2.72.202.B.4 or 72.202.D.3.c NMAC)	
Minor Source Technical Permit Revision 20.2.72.219.B.1.d.vi NMAC for like-kind unit replacements.	
Other: i.e. SSM modeling. See #2 above.	
This application does not require modeling since this is a No Permit Required (NPR) application.	
This application does not require modeling since this is a Notice of Intent (NOI) application (20.2.73 NMAC).	
This application does not require modeling according to 20.2.70.7.E(11), 20.2.72.203.A(4), 20.2.74.303, 20.2.79.109.D NMAC and in accordance with the Air Quality Bureau's Modeling Guidelines.	

Check each box that applies:

- ☐ See attached, approved modeling **waiver for all** pollutants from the facility.
- ☐ See attached, approved modeling **waiver for some** pollutants from the facility.
- ☒ Attached in Universal Application Form 4 (UA4) is a **modeling report for all** pollutants from the facility.
- ☐ Attached in UA4 is a **modeling report for some** pollutants from the facility.
- ☐ No modeling is required.



Air Quality Impact Assessment Protocol

Proposed Westside Station Power Plant

Saddle Butte Energy

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Denver, Colorado 80202

Prepared by:

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SLR Project No.: 118.021402.00001

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Acronyms and Abbreviations

ARM2	Ambient Ratio Method 2
AQIA	Air Quality Impact Analysis
AQS	EPA Air Quality System
ASOS	Automated surface observing system
CO	Carbon monoxide
EPA	U.S. Environmental Protection Agency
NAAQS	National Ambient Air Quality Standards
NED	National Elevation Dataset
NMAAQs	New Mexico Ambient Air Quality Standards
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
NO	Nitrogen oxide
NO ₂	Nitrogen dioxide
NO _x	Oxides of nitrogen
NWS	National Weather Service
O ₃	Ozone
OEL	Occupational Exposure Level
OLM	Ozone limiting method
PM ₁₀	Particulate matter less than 10 µg in diameter
PM _{2.5}	Particulate matter less than 2.5 µg in diameter
PSD	Prevention of Significant Deterioration
PVMRM	Plume volume molar ratio method
RICE	Reciprocating internal combustion engine
ROI	Radius of influence
SIL	Significant impact level
SO ₂	Sulfur dioxide
UTM	Universal Transverse Mercator
VOC	Volatile organic compounds



1.0 Introduction

1.1 Overview

Saddle Butte Energy (SBE) plans to construct the Westside Station Power Plant (plant) located in San Juan County west of Farmington, near Kirtland, New Mexico. The proposed plant will generate power using natural gas-fired lean burn reciprocating internal combustion engines (RICE). The engines on site will consist of 16 3.0 – 4.5 megawatt (MW) engines for a total plant output of approximately 65 MW. All engines will have oxidation catalysts installed to control carbon monoxide (CO), volatile organic compounds (VOC), and formaldehyde emissions, and other hazardous air pollutant (HAP). The engines will also have selective catalytic reduction (SCR) installed to control oxides of nitrogen (NO_x). The location of the proposed plant is shown in **Figure 1-1**.

Based on preliminary emission estimates, the facility will be a minor source. Prior to beginning construction, the facility is required to obtain a minor source construction permit under 20.2.73 of the New Mexico Administrative Code (NMAC).

1.2 Modeling Requirements

The application to obtain an air quality permit to construct in New Mexico must include a cumulative air quality impact assessment (AQIA) that demonstrates compliance with applicable ambient air quality standards, PSD Class II increments, and New Mexico Air Toxics (20.2.72.203.A.4 NMAC). Based on an initial review of project emissions, an AQIA will be developed to demonstrate compliance with National and New Mexico ambient air quality standards (NAAQS and NMAAQS) for carbon monoxide (CO), nitrogen dioxide (NO₂), particulate matter less than 10 µm in diameter (PM₁₀) and less than 2.5 microns in diameter (PM_{2.5}), and sulfur dioxide (SO₂), PSD Class II increments for NO₂, SO₂, and PM₁₀, and air toxics thresholds for ammonia. The PM_{2.5} minor source baseline date has not been triggered in San Juan County; therefore, a PM_{2.5} PSD Class II increment demonstration will not be required. The applicable NAAQS, NMAAQS and PSD increments are presented in **Table 1-1**. The derivation of design concentrations to be compared to each NAAQS, NMAAQS, and PSD increment is discussed in **Section 3.3** and **Section 3.5** of this protocol.

This modeling protocol defines the regulatory framework and technical methods to be used for the AQIA that is required to support the permit application. The intent of this protocol is to provide the New Mexico Environment Department (NMED) Air Quality Bureau (the Bureau) with a description of the proposed modeling methodology prior to submitting the application and modeling analysis. The modeling analysis will be conducted in accordance with guidance provided by the Bureau and the U.S. Environmental Protection Agency (EPA) as outlined in the following documents:

- New Mexico Environment Department Air Quality Bureau Air Dispersion Modeling Guideline (NMED 2024) hereafter referred to as NMED Modeling Guidelines
- Guideline on Air Quality Models [published as 40 CFR 51, Appendix W] (EPA 2024) hereafter referred to as Appendix W



Figure 1-1 Location of the Proposed Westside Station Power Plant

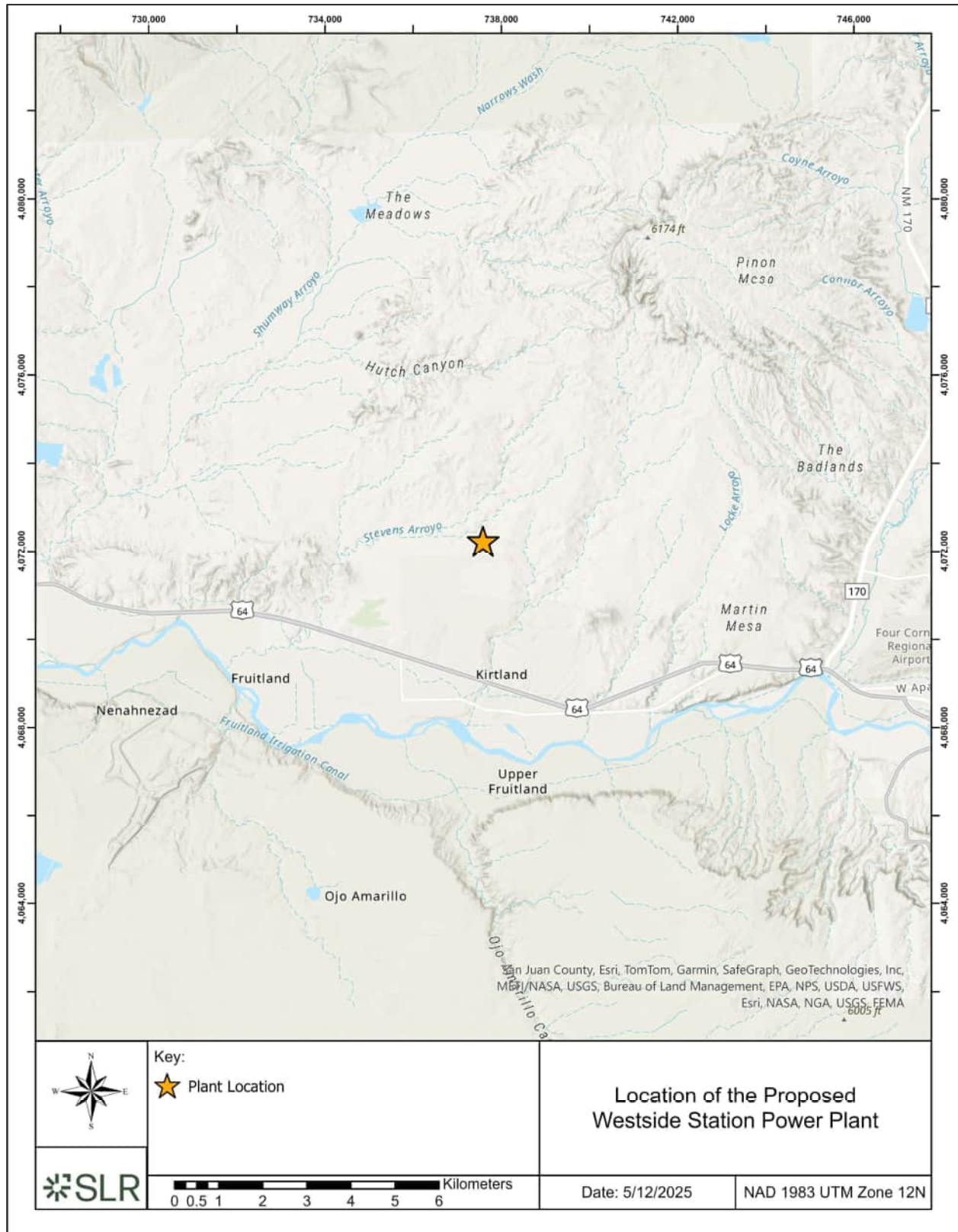


Table 1-1 NAAQS, NMAAQs and PSD Increments

Pollutant	Averaging Period	NAAQS (µg/m³)	NMAAQs (µg/m³)	Class II PSD Increment (µg/m³)	Occupational Exposure Level (µg/m³)
CO	1-hour	40,069.6	9,960.1	--	--
	8-hour	10,303.6	14,997.5	--	--
NO ₂	1-hour	188.03	--	--	--
	24-hour	--	188.03	--	--
	Annual	99.66	94.02	25	--
PM ₁₀	24-hour	150	--	30	--
	Annual	--	--	17	--
PM _{2.5}	24-hour	35	--	--	--
	Annual	9	--	--	--
SO ₂	1-hour	196.4	--	--	--
	3-hour	--	--	512	--
	24-hour	--	261.4	91	--
	Annual	26	52.4	20	--
Ammonia	8-hour	--	--	--	18
Note: NAAQS, NMAAQs and PSD Increments taken from Table 18 of the NMED Modeling Guideline					

2.0 Dispersion Modeling Methodology

2.1 Model Selection

To meet the dispersion modeling requirements for this analysis, the current version of the American Meteorological Society/EPA Regulatory Model (AERMOD) modeling system, the EPA-preferred regulatory modeling system. AERMOD is recommended for use in modeling multi-source emissions, and can account for plume downwash, stack tip downwash, and point, area, buoyant line, and volume sources.

Current versions of the AERMOD model and pre-processors will be used. If a model version is updated prior to approval of this protocol, the newest version will be used. These include:

- AERMAP version 24142
- BPIPPRM version 04274
- AERMOD version 24142



2.2 Model Input Options

All EPA regulatory default dispersion options will be used.

2.2.1 Urban Source Classification

An Auer land-use analysis, as described in 40 CFR 51 Appendix W was conducted to determine whether the project area should be classified as urban. Less than 50 percent of the area within a 3-kilometer (km) radius of the facility could be classified as urban land use types I1, I2, C1, R2, or R3 (heavy industrial, light/moderate industrial, commercial, compact residential [single family], or compact residential [multi-family], respectively). Therefore, the urban option in AERMOD (URBANOPT) will not be used and the default, rural dispersion coefficients will be used in the modeling analysis.

2.2.2 NO₂ Model Option

Appendix W presents a three-tiered approach that may be applied to modeling NO₂ impacts:

- Tier 1 – assume 100% conversion of nitrogen oxide (NO) to NO₂
- Tier 2 – Invoke the Ambient Ratio Method 2 (ARM2) option in AERMOD, which provides representative equilibrium ratios of NO₂/NO_x based on measured ambient levels of NO₂ and NO_x derived from national data from the EPA Air Quality System (AQS). Based on the project's NO_x impacts, a pre-defined portion of NO_x is converted to NO₂
- Tier 3 – The ozone limiting method (OLM) or the plume volume molar ratio method (PVMRM) as the most refined screening technique

Preliminary analyses show that the Tier 2, ARM2 option run in regulatory mode with a 0.9 and 0.5 upper and lower ratio limits will be sufficient to show compliance with the NO₂ NAAQS/NMAAQs. However, if a more refined lower ARM limit or the Tier 3 option becomes necessary to show compliance, Bureau modeling staff will be consulted to develop the necessary input data.

2.3 Meteorological Data

Hourly meteorological data used for air quality modeling must be spatially and climatologically representative of the area of interest. Appendix W recommends a minimum of one year of site-specific meteorological data or five consecutive years from the most recent, readily available data collected at a representative National Weather Service (NWS) station. Required surface meteorological data inputs to the AERMOD meteorological processor (AERMET) include, at minimum, hourly observations of wind speed, wind direction, temperature, and cloud cover (or solar radiation and low-level vertical temperature difference data in lieu of cloud cover). The meteorological processor also requires morning upper air sounding data from a representative NWS station.

The Bureau provides pre-processed meteorological data available on the NMED website¹ for use with AERMOD. The pre-processed data for Farmington using surface data from Four Corners Regional Airport (2017 – 2021) in Farmington with concurrent upper air data from Grand Junction, Colorado is proposed to be used in this analysis. Four Corners Regional Airport is located approximately 6 miles east-southeast of the proposed Plant location. Given the

¹ <https://cloud.env.nm.gov/resources/collection/411>



proximity of the automated surface observing system (ASOS) at Four Corners Regional Airport and that the terrain and land use in the vicinity of the ASOS station is similar to the area surrounding the proposed Plant location, the surface data from Four Corners Regional Airport is representative of meteorological conditions at the proposed Plant.

2.4 Receptor Network and Ambient Air Boundary

Cartesian receptor grids will be centered on the plant and defined using Universal Transverse Mercator (UTM) Zone 12 NAD83 coordinates. The grids are designed to accurately resolve the highest predicted pollutant impacts while at the same time minimizing model execution time. The ambient air boundary will be defined by a fence surrounding the plant. The grids will consist of a set of nested receptors placed at:

- 50-meter resolution along the facility ambient air boundary
- 100-m resolution extending from the facility ambient air boundary to a distance of 1 km from the receptor grid origin (the approximate mid-point of the modeled facility sources)
- 500-m resolution from 1 to 5 km from the receptor grid origin
- 1,000-m resolution from 5 to 20 km from the receptor grid origin

Fine grid receptors (100 m spaced) will be added to areas of potential high concentrations as needed.

Receptor elevation and hill height scale will be obtained using the AERMAP terrain processor. The digital terrain dataset provided as input to AERMAP will be the National Elevation Dataset (NED) digital terrain data at 1/3 arc-second resolution, which is equivalent to approximately 10 meters (m) in the project area. All AERMAP input and output files will be included in the model file archive submitted with the application.

2.5 Emission Source Inventory

The majority of the modeled emissions will result from large RICE. The plant will generate power using 16 natural gas-fired lean burn engines. The initial design calls for six of the RICE to have 70 foot (ft) vertical release stacks and be housed in a single 30 ft tall building. These stacks will be represented as POINT sources in the modeling. The other ten RICE are designed to have 36 ft, horizontal release stacks. Therefore, the RICE will be represented using the POINTHOR source type in AERMOD. The housing for each of the ten RICE is a container approximately 28 ft. tall. The design of the stacks may be modified with the revised design informed by the modeling analysis.

The proposed plant is situated on a 21-acre site with each stack located at least 130 ft from the facility fence line. The proposed site is located in an area of complex terrain with increasing elevations to the north and east. Terrain features greater than stack tops are approximately one mile from the site.

The RICE will combust pipeline quality natural gas so SO₂ emissions are expected to be small. NO_x and CO emissions will be controlled with SCR/Oxidation Catalyst system.

2.6 Plume Downwash

The effects of plume downwash will be considered for all stacks, based on building locations and heights relative to facility emission sources. Direction-specific downwash parameters will be calculated using the current version of the EPA-approved Building Profile Input Program



(BPIPPRM Version 04274). Building dimensions will be obtained from site plans and design specifications for the Plant. BPIPPRM input and output files will be included in the model file archive submitted electronically with the air permit application.

3.0 Modeling Procedures

3.1 Significant Impact Analysis – Criteria Pollutants

A significant impact analysis will be conducted for criteria pollutants to determine whether project impacts could potentially cause or contribute to a violation of a NAAQS, NMAAQS, or PSD increment; that is, exceed the significant impact levels (SILs). Maximum model concentrations due to project emissions will be compared to the applicable SILs for CO, NO₂, PM₁₀, PM_{2.5}, and SO₂. **Table 3-1** presents the relevant Class II area SILs.

If the maximum modeled concentration for a pollutant and averaging period is less than the applicable SILs, then no additional analysis is required for that pollutant and averaging period. If the maximum modeled concentration is equal to or above the SIL, then a cumulative analysis is required for that pollutant and averaging period.

The significant impact analysis is also used to determine the radius of influence (ROI) for each pollutant and averaging period with concentrations greater than the SIL. Per the NMED Modeling Guidelines, the ROI, is based on the most distant receptor at which the project results in model concentrations greater than the Class II area SILs. If a cumulative NAAQS, NMAAQS, or PSD Increment analysis is needed, all receptors within the ROI for each pollutant and averaging period will be included in the cumulative modeling.

Table 3-1 Significant Impact Levels

Pollutant	Averaging Period	Class II SIL (µg/m ³)
CO	1-hour	2,000
	8-hour	500
NO ₂	1-hour	7.52
	24-hour	5.0
	Annual	1.0
PM ₁₀	24-hour	5.0
	Annual	1.0
PM _{2.5}	24-hour	1.2
	Annual	0.13
SO ₂	1-hour	7.8
	3-hour	25.0
	24-hour	5.0
	Annual	1.0
Note: SILs taken from Table 18 of the NMED Modeling Guideline		



3.2 Secondary PM_{2.5} Impact Analysis

The EPA document *Guidance for Ozone and Fine Particulate Matter Permit Modeling* (EPA 2022) will be used to develop an evaluation of the potential impacts of Project related SO₂ and NO_x emissions on the secondary formation of PM_{2.5}. Project emissions will be assessed using the information provided in the EPA document *Guidance on the Development of Modeled Emission Rates for Precursors (MERPs) as a Tier 1 Demonstration Tool for Ozone and PM_{2.5} under the PSD Permitting Program* (EPA 2024b) and guidance provided in the NMED Modeling Guideline. Secondary PM_{2.5} concentrations resulting from this analysis will be added to the primary PM_{2.5} model concentrations for comparison to the SIL and development of the ROI.

3.3 Cumulative NAAQS, and NMAAQS Analysis

A cumulative NAAQS and NMAAQS analysis will be performed for all pollutants and averaging periods with project impacts greater than the respective SIL. The NAAQS and NMAAQS represent the maximum concentration allowed in ambient air for a given criteria pollutant. Cumulative modeling will include only receptors that fall within the ROI for the respective pollutant and averaging period.

Compliance with the applicable NAAQS and NMAAQS is based on the design concentration, which consists of model concentrations resulting from allowable emissions of all Plant sources and emissions from nearby inventory sources, summed with an ambient background concentration. Below is a summary of the derivation of each design value.

CO

The design value for the 1-hour and 8-hour NMAAQS is based on the maximum model concentration. Compliance with the 1-hour and 8-hour NMAAQS also demonstrates compliance with the 1-hour and 8-hour NAAQS.

NO₂

The design value for the 1-hour NAAQS is based on the 98th percentile of the daily maximum 1-hour concentration. The design value for the annual NMAAQS is the maximum annual concentration. Compliance with the 1-hour NAAQS also demonstrates compliance with the 24-hour NMAAQS. Compliance with the annual NMAAQS demonstrates compliance with the annual NAAQS.

PM₁₀

The design value for the 24-hour NAAQS is based on the highest of the second highest model concentration.

PM_{2.5}

The design value for the 24-hour NAAQS is based on the 98th percentile of the maximum daily model concentration. The design value for the annual NAAQS is the maximum annual concentration.

SO₂

The design value for the 1-hour NAAQS is based on the 99th percentile of the daily maximum 1-hour concentration. The design value for the annual NAAQS is the maximum annual concentration. Compliance with the 1-hour NAAQS also demonstrates compliance with the 24-hour NMAAQS. Compliance with the annual NAAQS demonstrates compliance with the annual NMAAQS. Note that the 3-hour NAAQS was revoked on December 27, 2024, and replaced with an annual standard.



3.4 Background Concentrations

Per Appendix W Section 8.3, the criteria pollutant background concentrations should include:

- Nearby sources – defined as sources located in the vicinity of the project source that are not adequately represented by ambient monitoring data. These are sources are explicitly included in the cumulative modeling analysis.
- Other Sources – defined as the portion of the background attributable to natural sources, unidentified sources, and regional transport captured in adequately representative ambient monitoring data.

3.4.1 Nearby Source Inventory

The cumulative NAAQS and NMAAQs analyses must account for nearby sources located in the vicinity of the Plant area. These sources will be explicitly included in the modeling analysis.

NMED maintains an inventory of source data and emissions for sources located in New Mexico. The data is made available through the MergeMaster Source Retrieval website where the user can query the database by entering the coordinates of a location of interest. The MergeMaster website will produce AERMOD model-ready input files for all criteria pollutants that contain model information for sources within 25 km of the point of interest and “very large sources” within 50 km. Only those sources included in the “NAAQS” source group in the model-ready files will be included in the NAAQS and NMAAQs analysis.

Data obtained from the MergeMaster database will be used to develop the nearby source inventory and will be refined, if needed, using methodologies provided in the NMED Modeling Guidelines and the EPA document *Guidance on the Development of Background Concentrations for Use in Modeling Demonstrations* (EPA 2024c). Any changes made to the model-ready files downloaded from MergeMaster will be documented in the modeling report that accompanies the air permit application.

3.4.2 Ambient Background Concentrations

The cumulative impact analysis will include an appropriate measured concentration from a representative ambient monitor that represents “Other Sources” attributable to natural sources, unidentified sources, and regional transport.

The MergeMaster Source Retrieval website also provides locations of and design concentrations for the nearest monitor for each criteria pollutant. The monitor concentrations are also provided in Table 34 of the NMED Modeling Guideline. **Table 3-2** provides the monitor locations and design concentrations generated by MergeMaster that are proposed to be used in this analysis.



Table 3-2 Proposed Ambient Background Concentrations

Pollutant	Averaging Period	Design Concentration (µg/m³)	Location/ID	ID
CO ¹	1-hour	2,148	Albuquerque	35001023
	8-hour	1,265		
NO ₂ ²	1-hour	45.7	Shiprock Substation	350451005 (1H)
	Annual	5.9		
PM ₁₀ ³	24-hour	66.0	Shiprock Substation	350451005 (1H)
PM _{2.5} ⁴	24-hour	11.77	Farmington	350450019 (1FO)
	Annual	4.19		
SO ₂ ⁵	1-hour	27.9	Shiprock Substation	350451005 (1H)
	Annual	1.0		
1. Concentrations are the average maximum concentrations from 2018 – 2020 2. The 1-hour concentration is the three-year average of the 98th percentile 1-hour concentration from each year using monitoring data from 2018 – 2020 The annual concentration is the three-year annual average of monitoring data from 2018 – 2020 3. The concentration is the three-year average of the second highest concentration from each year using monitor data from 2018 - 2020 4. The 24-hour concentration is the three-year average of the 98th percentile of the maximum daily concentration using monitoring data from 2013 – 2015 The annual concentration is the three-year annual average of monitoring data from 2013 – 2015 5. The 1-hour concentration is the three-year average of the 99th percentile 1-hour concentration from each year using monitoring data from 2018 – 2020 6. The annual concentration is the three-year annual average of monitoring data from 2018 – 2020				

3.5 Cumulative Class II PSD Increment Analysis

A cumulative PSD increment analysis will be performed for all pollutants and averaging periods with project impacts greater than the respective SIL. The PSD increment represents the maximum amount the concentration of a given pollutant is allowed to increase above a baseline concentration for a pollutant. Cumulative modeling will include only receptors within the ROI for the respective pollutant and averaging period.

Compliance with the applicable PSD increment is based on the model concentration considering emissions from all facility sources and nearby increment consuming and expanding inventory sources. The nearby source inventory from MergeMaster described in **Section 3.4.1** will be used for the PSD increment analysis. Only those sources included in the “PSD” source group in the model-ready files will be included in the PSD increment analysis.

Compliance with a short-term PSD increment is demonstrated by comparing the highest of the second highest model concentration to the applicable increment. Compliance with the annual PSD increment is demonstrated by comparing the maximum annual model concentration to the applicable increment.



3.6 Air Toxics Modeling

Source-only modeling must be provided for any toxic air pollutant sources that may emit any toxic pollutant in excess of the emission levels specified in 20.2.72.502 NMAC. Based on an initial review of project emissions, an air toxics analysis will need to be performed for ammonia.

Modeling will be conducted using the methodologies presented in Section 2.0 of this modeling protocol. Compliance will be demonstrated if the 8-hour model concentration is below the Occupational Exposure Level (OEL) for ammonia of $18 \mu\text{g}/\text{m}^3$ listed in 20.2.72.502 NMAC.



4.0 References

- EPA, 2024. *Guideline on Air Quality Models*. Published as 40 CFR 58 Appendix W. November 20, 2024.
- EPA, 2024b. *Clarification on the Development of Modeled Emission Rates for Precursors (MERPs) as a Tier 1 Demonstration Tool for Ozone and PM_{2.5} under the PSD Permitting Program*. Memorandum from Richard A. Wayland (Air Quality Assessment Division). April 30, 2024
- EPA, 2024c. *Guidance on Developing Background Concentrations for Use in Modeling Demonstrations*. Memorandum from Richard A. Wayland (Air Quality Assessment Division). November 20, 2024
- EPA, 2022. *Guidance for Ozone and Fine Particulate Matter Permit Modeling*. Richard Wayland (Air Quality Assessment Division), Scott Mathias (Air Quality Policy Division). July 29, 2022.
- NMED, 2024. *New Mexico Air Quality Bureau Air Dispersion Modeling Guidelines*. June 2024.



Universal Application 4

Air Dispersion Modeling Report

Refer to and complete Section 16 of the Universal Application form (UA3) to assist your determination as to whether modeling is required. If, after filling out Section 16, you are still unsure if modeling is required, e-mail the completed Section 16 to the AQB Modeling Manager for assistance in making this determination. If modeling is required, a modeling protocol would be submitted and approved prior to an application submittal. The protocol should be emailed to the modeling manager. A protocol is recommended but optional for minor sources and is required for new PSD sources or PSD major modifications. Fill out and submit this portion of the Universal Application form (UA4), the "Air Dispersion Modeling Report", only if air dispersion modeling is required for this application submittal. This serves as your modeling report submittal and should contain all the information needed to describe the modeling. No other modeling report or modeling protocol should be submitted with this permit application.

16-A: Identification		
1	Name of facility:	Westside Power Plant
2	Name of company:	Saddle Butte Energy
3	Current Permit number:	NA
4	Name of applicant's modeler:	Matthew Stresing
5	Phone number of modeler:	781-258-6152
6	E-mail of modeler:	mstresing@slrconsulting.com

16-B: Brief			
1	Was a modeling protocol submitted and approved?	Yes ☒	No ☐
2	Why is the modeling being done?	New Facility	
3	Describe the permit changes relevant to the modeling. New facility		
4	What geodetic datum was used in the modeling?	NAD83	
5	How long will the facility be at this location?	permanent	
6	Is the facility a major source with respect to Prevention of Significant Deterioration (PSD)?	Yes ☐	No ☒

7	Identify the Air Quality Control Region (AQCR) in which the facility is located		014
8	List the PSD baseline dates for this region (minor or major, as appropriate).		
	NO2	6/6/1989	
	SO2	8/7/1978	
	PM10	8/7/1978	
	PM2.5	NA	
9	Provide the name and distance to Class I areas within 50 km of the facility (300 km for PSD permits).		
	NA		
10	Is the facility located in a non-attainment area? If so describe below	Yes ☐	No ☒
11	Describe any special modeling requirements, such as streamline permit requirements.		
	NA		

16-C: Modeling History of Facility

1	Describe the modeling history of the facility, including the air permit numbers, the pollutants modeled, the National Ambient Air Quality Standards (NAAQS), New Mexico AAQS (NMAAQs), and PSD increments modeled. (Do not include modeling waivers).			
	Pollutant	Latest permit and modification number that modeled the pollutant facility-wide.	Date of Permit	Comments
	CO	NA		
	NO ₂	NA		
	SO ₂	NA		
	H ₂ S	NA		
	PM2.5	NA		
	PM10	NA		
	Lead	NA		
	Ozone (PSD only)	NA		
	NM Toxic Air Pollutants (20.2.72.402 NMAC)	NA		

16-D: Modeling performed for this application

1	For each pollutant, indicate the modeling performed and submitted with this application. Choose the most complicated modeling applicable for that pollutant, i.e., culpability analysis assumes ROI and cumulative analysis were also performed.					
	Pollutant	ROI	Cumulative analysis	Culpability analysis	Waiver approved	Pollutant not emitted or not changed.
	CO	☒	☐	☐	☐	☐

	NO ₂	☒	☒	☒	☐	☐
	SO ₂	☒	☐	☐	☐	☐
	H ₂ S	☐	☐	☐	☐	☐
	PM _{2.5}	☒	☐	☐	☐	☐
	PM ₁₀	☒	☐	☐	☐	☐
	Lead	☐	☐	☐	☐	☐
	Ozone	☒	☐	☐	☐	☐
	State air toxic(s) (20.2.72.402 NMAC)	☒	☐	☐	☐	☐

16-E: New Mexico toxic air pollutants modeling

1	List any New Mexico toxic air pollutants (NMTAPs) from Tables A and B in 20.2.72.502 NMAC that are modeled for this application. Ammonia					
2	List any NMTAPs that are emitted but not modeled because stack height correction factor. Add additional rows to the table below, if required.					
	Pollutant	Emission Rate (pounds/hour)	Emission Rate Screening Level (pounds/hour)	Stack Height (meters)	Correction Factor	Emission Rate/ Correction Factor

16-F: Modeling options

1	Was the latest version of AERMOD used with regulatory default options? If not explain below.	Yes ☒	No ☐

16-G: Surrounding source modeling

1	Date of surrounding source retrieval	4/30/2025
2	If the surrounding source inventory provided by the Air Quality Bureau was believed to be inaccurate, describe how the sources modeled differ from the inventory provided. If changes to the surrounding source inventory were made, use the table below to describe them. Add rows as needed.	
	AQB Source ID	Description of Corrections
	NA	

16-H: Building and structure downwash

1	How many buildings are present at the facility?	15
2	How many above ground storage tanks are present at the facility?	2

3	Was building downwash modeled for all buildings and tanks? If not explain why below.	Yes ☒	No ☐
4	Building comments		

16-I: Receptors and modeled property boundary

1	“Restricted Area” is an area to which public entry is effectively precluded. Effective barriers include continuous fencing, continuous walls, or other continuous barriers approved by the Department, such as rugged physical terrain with a steep grade that would require special equipment to traverse. If a large property is completely enclosed by fencing, a restricted area within the property may be identified with signage only. Public roads cannot be part of a Restricted Area. A Restricted Area is required in order to exclude receptors from the facility property. If the facility does not have a Restricted Area, then receptors shall be placed within the property boundaries of the facility. Describe the fence or other physical barrier at the facility that defines the restricted area. The facility will be fenced. The fence will be continuous.						
	2	Receptors must be placed along publicly accessible roads in the restricted area. Are there public roads passing through the restricted area?				Yes ☐	No ☒
	3	Are restricted area boundary coordinates included in the modeling files?				Yes ☒	No ☐
4	Describe the receptor grids and their spacing. The table below may be used, adding rows as needed.						
	Grid Type	Shape	Spacing	Start distance from restricted area or center of facility	End distance from restricted area or center of facility	Comments	
	Cartesian	Square	100 m	0 m	1000 m		
			500 m	1000 m	5000 m		
			1000 m	5000 m	50000 m		
5	Describe receptor spacing along the fence line.						
	50 m						
6	Describe the PSD Class I area receptors.						
	NA						

16-J: Modeling Scenarios

1	Identify, define, and describe all modeling scenarios. Examples of modeling scenarios include using different production rates, times of day, times of year, simultaneous or alternate operation of old and new equipment during transition periods, etc. Alternative operating scenarios should correspond to all parts of the Universal Application and should be fully described in Section 15 of the Universal Application (UA3).
	The modeling was conducted assuming continuous operation (8,760 hours per year) of all sources
	Which scenario produces the highest concentrations? Why?

2	NA											
3	Were emission factor sets used to limit emission rates or hours of operation? (This question pertains to the "SEASON", "MONTH", "HROFDY" and related factor sets, not to the factors used for calculating the maximum emission rate.)									Yes ☐	No ☒	
4	If so, describe factors for each group of sources. List the sources in each group before the factor table for that group. (Modify or duplicate table as necessary. It's ok to put the table below section 16-K if it makes formatting easier.) Sources:											
5	Hour of Day	Factor	Hour of Day	Factor								
	1		13									
	2		14									
	3		15									
	4		16									
	5		17									
	6		18									
	7		19									
	8		20									
	9		21									
	10		22									
	11		23									
	12		24									
If hourly, variable emission rates were used that were not described above, describe them below.												
6	Were different emission rates used for short-term and annual modeling? If so describe below.									Yes ☐	No ☒	

16-K: NO₂ Modeling

1	Which types of NO ₂ modeling were used? Check all that apply.											
	☒	ARM2										
	☐	100% NO _x to NO ₂ conversion										
	☐	PVMRM										
	☐	OLM										
	☐	Other:										
2	Describe the NO ₂ modeling.											
All NO ₂ modeling was conducted using the ARM2 option												
3	Were default NO ₂ /NO _x ratios (0.5 minimum, 0.9 maximum or equilibrium) used? If not describe and justify the ratios used below.									Yes ☒	No ☐	

4	Describe the design value used for each averaging period modeled.
	1-hour: 98th percentile as calculated by AERMOD Annual One Year Annual Average:

16-L: Ozone Analysis

1	NMED has performed a generic analysis that demonstrates sources that are minor with respect to PSD do not cause or contribute to any violations of ozone NAAQS. The analysis follows. The basis of the ozone SIL is documented in Guidance on Significant Impact Levels for Ozone and Fine Particles in the Prevention of Significant Deterioration Permitting Program, EPA, April 17, 2018 and associated documents. NMED accepts this SIL basis and incorporates it into this permit record by reference. Complete documentation of the ozone concentration analysis using MERPS is included in the New Mexico Air Quality Bureau Air Dispersion Modeling Guidelines.			
2	The MERP values presented in Table 10 and Table 11 of the NM AQB Modeling Guidelines that produce the highest concentrations indicate that facilities emitting no more than 250 tons/year of NO_x and no more than 250 tons/year of VOCs will cause less formation of O₃ than the O₃ significance level. $[O_3]_{8-hour} = \left(\frac{250 \frac{ton}{yr}}{340_{MERP_{NOX}}} + \frac{250 \frac{ton}{yr}}{4679_{MERP_{VOC}}} \right) \times 1.96 \mu g/m^3$ =1.546 μg/m³, which is below the significance level of 1.96 μg/m³. Sources that produce ozone concentrations below the ozone SIL do not cause or contribute to air contaminant levels exceeding the ozone NAAQS.			
3	Does the facility emit at least 250 tons per year of NO _x or at least 250 tons per year of VOCs? Sources that emit at least 250 tons per year of NO _x or at least 250 tons per year of VOCs are covered by the analysis above and require an individual analysis.		Yes ☐	No ☒
5	For new PSD Major Sources or PSD major modifications, if MERPs were used to account for ozone fill out the information below. If another method was used describe below.			
	NO _x (ton/yr)	MERP _{NOX}	VOCs (ton/yr)	MERP _{VOC}

16-M: Particulate Matter Modeling

1	Select the pollutants for which plume depletion modeling was used.		
	☐	PM2.5	
	☐	PM10	
	☒	None	
2	Describe the particle size distributions used. Include the source of information.		
3	Does the facility emit at least 40 tons per year of NO _x or at least 40 tons per year of SO ₂ ? Sources that emit at least 40 tons per year of NO _x or at least 40 tons per year of SO ₂ are considered to emit		Yes ☒ No ☐

	significant amounts of precursors and must account for secondary formation of PM _{2.5} .				
4	Was secondary PM modeled for PM _{2.5} ?			Yes ☒	No ☐
5	If MERPs were used to account for secondary PM _{2.5} fill out the information below. If another method was used describe below.				
	Pollutant	NO _x	SO ₂		[PM _{2.5}] _{24-hour}
	MERP _{annual}	43,833	48,057		0.0062 µg/m ³
	MERP _{24-hour}	33,634	11,410		[PM _{2.5}] _{annual}
	Emission rate (ton/yr)	159.04	4.74		0.0005 µg/m ³

16-N: Setback Distances

1	Portable sources or sources that need flexibility in their site configuration requires that setback distances be determined between the emission sources and the restricted area boundary (e.g. fence line) for both the initial location and future locations. Describe the setback distances for the initial location.
	NA
2	Describe the requested, modeled, setback distances for future locations, if this permit is for a portable stationary source. Include a haul road in the relocation modeling.
	NA

16-O: PSD Increment and Source IDs

1	The unit numbers in the Tables 2-A, 2-B, 2-C, 2-E, 2-F, and 2-I should match the ones in the modeling files. Do these match? If not, provide a cross-reference table between unit numbers if they do not match below.				Yes ☒	No ☐
	Unit Number in UA-2		Unit Number in Modeling Files			
2	The emission rates in the Tables 2-E and 2-F should match the ones in the modeling files. Do these match? If not, explain why below.				Yes ☒	No ☐
3	Have the minor NSR exempt sources or Title V Insignificant Activities" (Table 2-B) sources been modeled?				Yes ☐	No ☒
4	Which units consume increment for which pollutants?					
	Unit ID	NO ₂	SO ₂	PM ₁₀	PM _{2.5}	
	All	X	X	X	X	
5	PSD increment description for sources. (for unusual cases, i.e., baseline unit expanded emissions after baseline date).					
	Are all the actual installation dates included in Table 2A of the application form, as required?				Yes ☐	No ☒

6	This is necessary to verify the accuracy of PSD increment modeling. If not please explain how increment consumption status is determined for the missing installation dates below.		
	The facility has not been constructed		

16-P: Flare Modeling

1	For each flare or flaring scenario, complete the following			
	Flare ID (and scenario)	Average Molecular Weight	Gross Heat Release (cal/s)	Effective Flare Diameter (m)

16-Q: Volume and Related Sources

1	Were the dimensions of volume sources different from standard dimensions in the Air Quality Bureau (AQB) Modeling Guidelines?	Yes ☐	No ☐
	If not please explain how increment consumption status is determined for the missing installation dates below.		
2	Describe the determination of sigma-Y and sigma-Z for fugitive sources.		
3	Describe how the volume sources are related to unit numbers. Or say they are the same.		
4	Describe any open pits.		
5	Describe emission units included in each open pit.		

16-R: Background Concentrations

1	Were NMED provided background concentrations used? Identify the background station used below. If non-NMED provided background concentrations were used describe the data that was used.	Yes ☐	No ☒
	CO: Choose an item.		
	NO ₂ : Choose an item.		
	PM _{2.5} : Choose an item.		
	PM ₁₀ : Choose an item.		
	SO ₂ : Choose an item.		
	Other:		

	Comments:	Per guidance from NMED modeling staff, for gaseous pollutants, an ambient monitoring concentration does not need to be included if nearby sources are explicitly included in the modeling	
2	Were background concentrations refined to monthly or hourly values? If so describe below.	Yes ☐	No ☐

16-S: Meteorological Data

1	Was NMED provided meteorological data used? If so select the station used. Four Corners (Farmington)	Yes ☒	No ☐
2	If NMED provided meteorological data was not used describe the data set(s) used below. Discuss how missing data were handled, how stability class was determined, and how the data were processed.		

16-T: Terrain

1	Was complex terrain used in the modeling? If not, describe why below.	Yes ☒	No ☐
2	What was the source of the terrain data?		
National Elevation Dataset (NED)			

16-U: Modeling Files

1	Describe the modeling files: Each folder listed below contains the following pollutant specific files: input (.inp), source data (.src), detailed output (.out), summary output (.sum) and plot files (.plt). The NAAQS\NO2-1hr\Culpability folder contain a culpability output file (max.dat)		
	File name (or folder and file name)	Pollutant(s)	Purpose (ROI/SIA, cumulative, culpability analysis, other)
	SIA (folder)	CO, NO2, PM2.5, PM10, SO2	ROI/SIA
	NAAQS (folder)	NO2	Cumulative NMAAQs/NAAQS
	PSD Increment	NO2	Cumulative PSD Increment
	Toxics	Ammonia	Other – Toxics Modeling
	NAAQS\NO2-1hr\Culpability	NO2	Culpability

16-V: PSD New or Major Modification Applications

1	A new PSD major source or a major modification to an existing PSD major source requires additional analysis.	Yes ☐	No ☐
---	--	------------------------------	-----------------------------

	Was preconstruction monitoring done (see 20.2.74.306 NMAC and PSD Preapplication Guidance on the AQB website)?		
2	If not, did AQB approve an exemption from preconstruction monitoring?	Yes ☐	No ☐
3	Describe how preconstruction monitoring has been addressed or attach the approved preconstruction monitoring or monitoring exemption.		
4	Describe the additional impacts analysis required at 20.2.74.304 NMAC.		
5	If required, have ozone and secondary PM2.5 ambient impacts analyses been completed? If so describe below.	Yes ☐	No ☐

16-W: Modeling Results

1	If ambient standards are exceeded because of surrounding sources, a culpability analysis is required for the source to show that the contribution from this source is less than the significance levels for the specific pollutant. Was culpability analysis performed? If so describe below.							Yes ☒	No ☐	
	A culpability analysis was performed for 1-hour NO2 NAAQS using the MAXDCONT culpability tool in AERMOD. The analysis was only performed at receptor location where concentrations are greater than the NAAQS. The culpability was performed for the 8 th rank (H8H) through 40 th rank (H40H), the rank at which all receptors have a design concentration lower than the NAAQS. The analysis shows that the project does not significantly contribute to a model exceedance and does not cause or contribute to a violation of the NAAQS									
2	Identify the maximum concentrations from the modeling analysis. Rows may be modified, added and removed from the table below as necessary.									
Pollutant, Time Period and Standard	Modeled Facility Concentration (µg/m3)	Modeled Concentration with Surrounding Sources (µg/m3)	Secondary PM (µg/m3)	Background Concentration (µg/m3)	Cumulative Concentration (µg/m3)	Value of Standard (µg/m3)	Percent of Standard	Location		
								UTM E (m)	UTM N (m)	Elevation (ft)
1-hour NO2 NAAQS	0.00768	426.48	--	--	426.4844	188.03	227	735050.00	4071310.00	5295.5
Annual NO2 NMAAQs	0.51	23.16	--	--	23.16	94.02	25	738050.00	4069810.00	5273.6
Annual NO2 PSD Increment	0.51	21.37	--	--	21.37	25	85	738050.00	4069810.00	5273.6

16-X: Summary/conclusions

	A statement that modeling requirements have been satisfied and that the permit can be issued.
1	The Significant Impact Analysis results show that the proposed facility has a significant impact for 1-hour and annual NO2. Results of all other pollutants/averaging periods are Insignificant. The Cumulative modeling analysis shows that the proposed facility in in compliance with all NMAAQs, NAAQS and PSD increments.



Air Quality Impact Assessment

Proposed Westside Station Power Plant

Saddle Butte Energy

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Denver, Colorado 80202

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SLR Project No.: 118.021402.00001

September 8, 2025

Revision: 00

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Acronyms and Abbreviations

ARM2	Ambient Ratio Method 2
AQIA	Air Quality Impact Analysis
AQS	EPA Air Quality System
ASOS	Automated surface observing system
CO	Carbon monoxide
EPA	U.S. Environmental Protection Agency
NAAQS	National Ambient Air Quality Standards
NED	National Elevation Dataset
NMAAQs	New Mexico Ambient Air Quality Standards
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
NO	Nitrogen oxide
NO ₂	Nitrogen dioxide
NO _x	Oxides of nitrogen
NWS	National Weather Service
O ₃	Ozone
OEL	Occupational Exposure Level
OLM	Ozone limiting method
PM ₁₀	Particulate matter less than 10 µg in diameter
PM _{2.5}	Particulate matter less than 2.5 µg in diameter
PSD	Prevention of Significant Deterioration
PVMRM	Plume volume molar ratio method
RICE	Reciprocating internal combustion engine
ROI	Radius of influence
SIL	Significant impact level
SO ₂	Sulfur dioxide
UTM	Universal Transverse Mercator
VOC	Volatile organic compounds



1.0 Introduction

1.1 Overview

Saddle Butte Energy (SBE) plans to construct the Westside Station Power Plant (plant) located in San Juan County, near Kirtland, New Mexico. The proposed plant will generate power using natural gas-fired lean burn reciprocating internal combustion engines (RICE). The engines on site will include six (6) Jenbacher J620's and ten (10) Jenbacher J624's for a total plant output of approximately 65 MW. All engines will have oxidation catalysts installed to control carbon monoxide (CO), volatile organic compounds (VOC), and formaldehyde emissions, and other hazardous air pollutant (HAP). The engines will also have selective catalytic reduction (SCR) installed to control oxides of nitrogen (NO_x). The location of the proposed plant is shown in **Figure 1-1**.

Based on emission estimates, the facility will be a minor source. Prior to beginning construction, the facility is required to obtain a minor source construction permit under 20.2.73 of the New Mexico Administrative Code (NMAC).

1.2 Modeling Requirements

The application to obtain an air quality permit to construct in New Mexico must include a cumulative air quality impact assessment (AQIA) that demonstrates compliance with applicable ambient air quality standards, PSD Class II increments, and New Mexico Air Toxics (20.2.72.203.A.4 NMAC). An AQIA was developed to demonstrate compliance with National and New Mexico ambient air quality standards (NAAQS and NMAAQS) for carbon monoxide (CO), nitrogen dioxide (NO₂), particulate matter less than 10 µm in diameter (PM₁₀) and less than 2.5 microns in diameter (PM_{2.5}), and sulfur dioxide (SO₂), PSD Class II increments for NO₂, SO₂, and PM₁₀, and air toxics thresholds for ammonia. The PM_{2.5} minor source baseline date has not been triggered in San Juan County; therefore, a PM_{2.5} PSD Class II increment demonstration is not required. The applicable NAAQS, NMAAQS and PSD increments are presented in **Table 1-1**. The derivation of design concentrations to be compared to each NAAQS, NMAAQS, and PSD increment is discussed in **Section 3.3** and **Section 3.5** of this report.

This report defines the regulatory framework and technical methods that were used for the AQIA that is required to support the permit application. A modeling protocol was submitted to the New Mexico Environment Department (NMED) Air Quality Bureau (the Bureau) on May 14, 2025 with a description of the proposed modeling methodology for the modeling analysis. The Bureau approved the protocol on May 29, 2025.

The modeling analysis was conducted in accordance with guidance provided by the Bureau and the U.S. Environmental Protection Agency (EPA) as outlined in the following documents:

- New Mexico Environment Department Air Quality Bureau Air Dispersion Modeling Guideline (NMED 2024) hereafter referred to as NMED Modeling Guidelines
- Guideline on Air Quality Models [published as 40 CFR 51, Appendix W] (USEPA 2024) hereafter referred to as Appendix W



Figure 1-1 Location of the Proposed Westside Station Power Plant

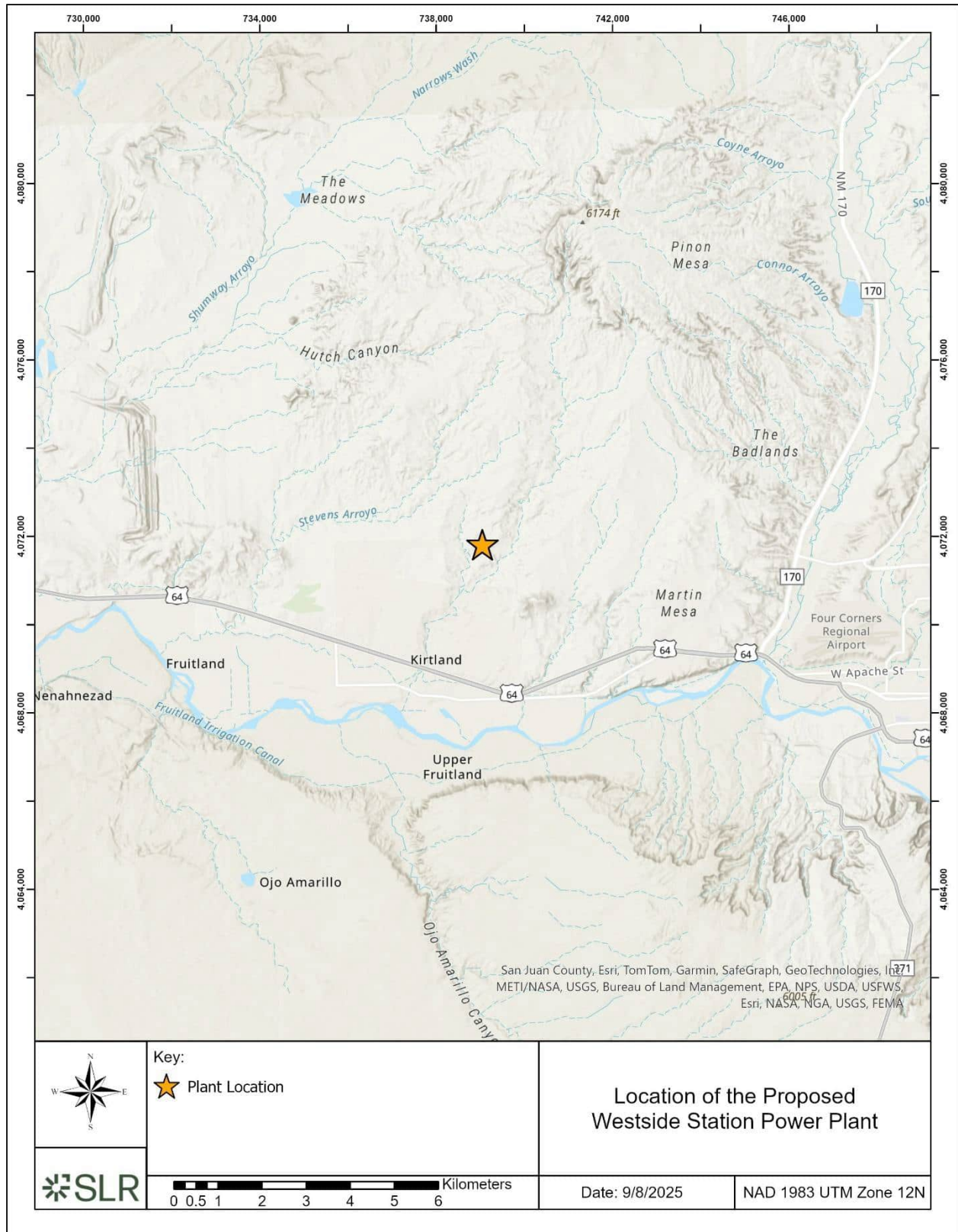


Table 1-1 NAAQS, NMAAQs and PSD Increments

Pollutant	Averaging Period	NAAQS (µg/m³)	NMAAQs (µg/m³)	Class II PSD Increment (µg/m³)	Occupational Exposure Level (µg/m³)
CO	1-hour	40,069.6	9,960.1	--	--
	8-hour	10,303.6	14,997.5	--	--
NO ₂	1-hour	188.03	--	--	--
	24-hour	--	188.03	--	--
	Annual	99.66	94.02	25	--
PM ₁₀	24-hour	150	--	30	--
	Annual	--	--	17	--
PM _{2.5}	24-hour	35	--	--	--
	Annual	9	--	--	--
SO ₂	1-hour	196.4	--	--	--
	3-hour	--	--	512	--
	24-hour	--	261.4	91	--
	Annual	26	52.4	20	--
Ammonia	8-hour	--	--	--	18

Note: NAAQS, NMAAQs and PSD Increments taken from Table 18 of the NMED Modeling Guideline

2.0 Dispersion Modeling Methodology

2.1 Model Selection

To meet the dispersion modeling requirements for this analysis, the current version of the American Meteorological Society/EPA Regulatory Model (AERMOD) modeling system, the EPA-preferred regulatory modeling system was used. AERMOD is recommended for use in modeling multi-source emissions, and can account for plume downwash, stack tip downwash, and point, area, buoyant line, and volume sources.

Current versions of the AERMOD model and pre-processors were used. These include:

- AERMAP version 24142
- BPIPPRM version 04274
- AERMOD version 24142

2.2 Model Input Options

All EPA regulatory default dispersion options were used.



2.2.1 Urban Source Classification

An Auer land-use analysis, as described in 40 CFR 51 Appendix W was conducted to determine whether the project area should be classified as urban. Less than 50 percent of the area within a 3-kilometer (km) radius of the facility could be classified as urban land use types I1, I2, C1, R2, or R3 (heavy industrial, light/moderate industrial, commercial, compact residential [single family], or compact residential [multi-family], respectively). Therefore, the urban option in AERMOD (URBANOPT) was not used and the default, rural dispersion coefficients were used in the modeling analysis.

2.2.2 NO₂ Model Option

Appendix W presents a three-tiered approach that may be applied to modeling NO₂ impacts:

- Tier 1 – assume 100% conversion of nitrogen oxide (NO) to NO₂
- Tier 2 – Invoke the Ambient Ratio Method 2 (ARM2) option in AERMOD, which provides representative equilibrium ratios of NO₂/NO_x based on measured ambient levels of NO₂ and NO_x derived from national data from the EPA Air Quality System (AQS). Based on the project's NO_x impacts, a pre-defined portion of NO_x is converted to NO₂
- Tier 3 – The ozone limiting method (OLM) or the plume volume molar ratio method (PVMRM) as the most refined screening technique

The Tier 2, ARM2 option run in regulatory mode with a 0.9 and 0.5 upper and lower ratio limits was used in this analysis.

2.3 Meteorological Data

Hourly meteorological data used for air quality modeling must be spatially and climatologically representative of the area of interest. Appendix W recommends a minimum of one year of site-specific meteorological data or five consecutive years from the most recent, readily available data collected at a representative National Weather Service (NWS) station. Required surface meteorological data inputs to the AERMOD meteorological processor (AERMET) include, at minimum, hourly observations of wind speed, wind direction, temperature, and cloud cover (or solar radiation and low-level vertical temperature difference data in lieu of cloud cover). The meteorological processor also requires morning upper air sounding data from a representative NWS station.

The Bureau provides pre-processed meteorological data available on the NMED website¹ for use with AERMOD. The pre-processed data for the Farmington dataset using surface data from Four Corners Regional Airport (2017 – 2021) in Farmington with concurrent upper air data from Grand Junction, Colorado was used in this analysis. Four Corners Regional Airport is located approximately 5 miles east-southeast of the proposed Plant location. Given the proximity of the automated surface observing system (ASOS) at Four Corners Regional Airport and that the terrain and land use in the vicinity of the ASOS station is similar to the area surrounding the proposed Plant location, the surface data from Four Corners Regional Airport is representative of meteorological conditions at the proposed Plant.

¹ <https://cloud.env.nm.gov/resources/collection/411>



2.4 Receptor Network and Ambient Air Boundary

Cartesian receptor grids will be centered on the plant and defined using Universal Transverse Mercator (UTM) Zone 12 NAD83 coordinates. The grids are designed to accurately resolve the highest predicted pollutant impacts while at the same time minimizing model execution time. The ambient air boundary is defined by a fence surrounding the proposed plant. The grids consist of a set of nested receptors placed at:

- 50-meter resolution along the facility ambient air boundary
- 100-m resolution extending from the facility ambient air boundary to a distance of 1 km from the receptor grid origin (the approximate mid-point of the modeled facility sources)
- 500-m resolution from 1 to 5 km from the receptor grid origin
- 1,000-m resolution from 5 to 50 km from the receptor grid origin

Receptor elevation and hill height scale were obtained using the AERMAP terrain processor. The digital terrain dataset used as input to AERMAP was the National Elevation Dataset (NED) digital terrain data at 1 arc-second resolution, which is equivalent to approximately 30 meters (m) in the project area. Typically, the 1/3 arc-second NED would be used but one of the files is corrupted and unable to be read by AERMAP. Therefore, the 1 arc-second data was used.

All AERMAP input and output files are included in the model file archive submitted with the application. **Figure 2-1** shows a far-field view of the receptors while **Figure 2-2** shows a near-field view of the receptors and the ambient air boundary.



Figure 2-1 Far-Field View of the Receptor Grid

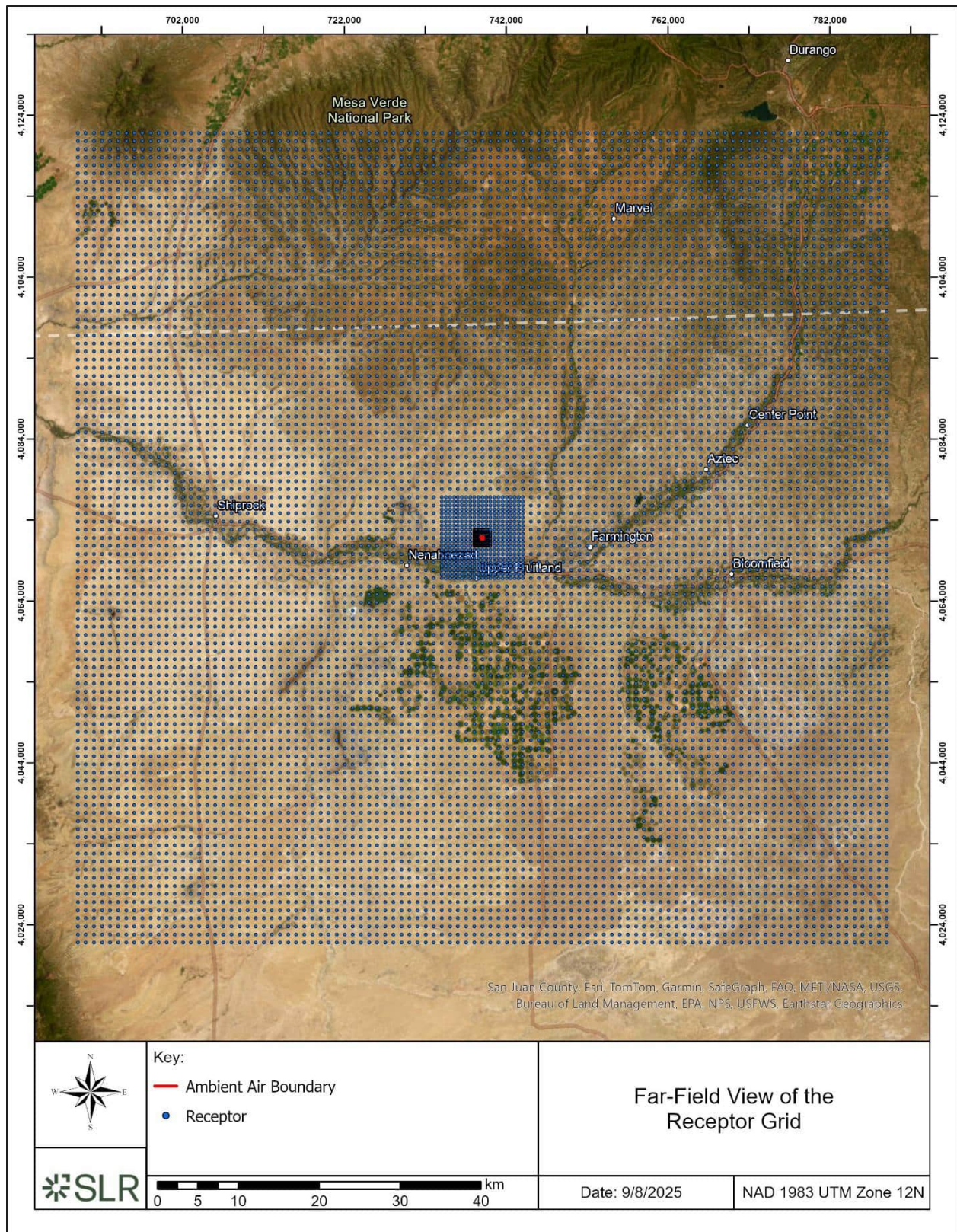
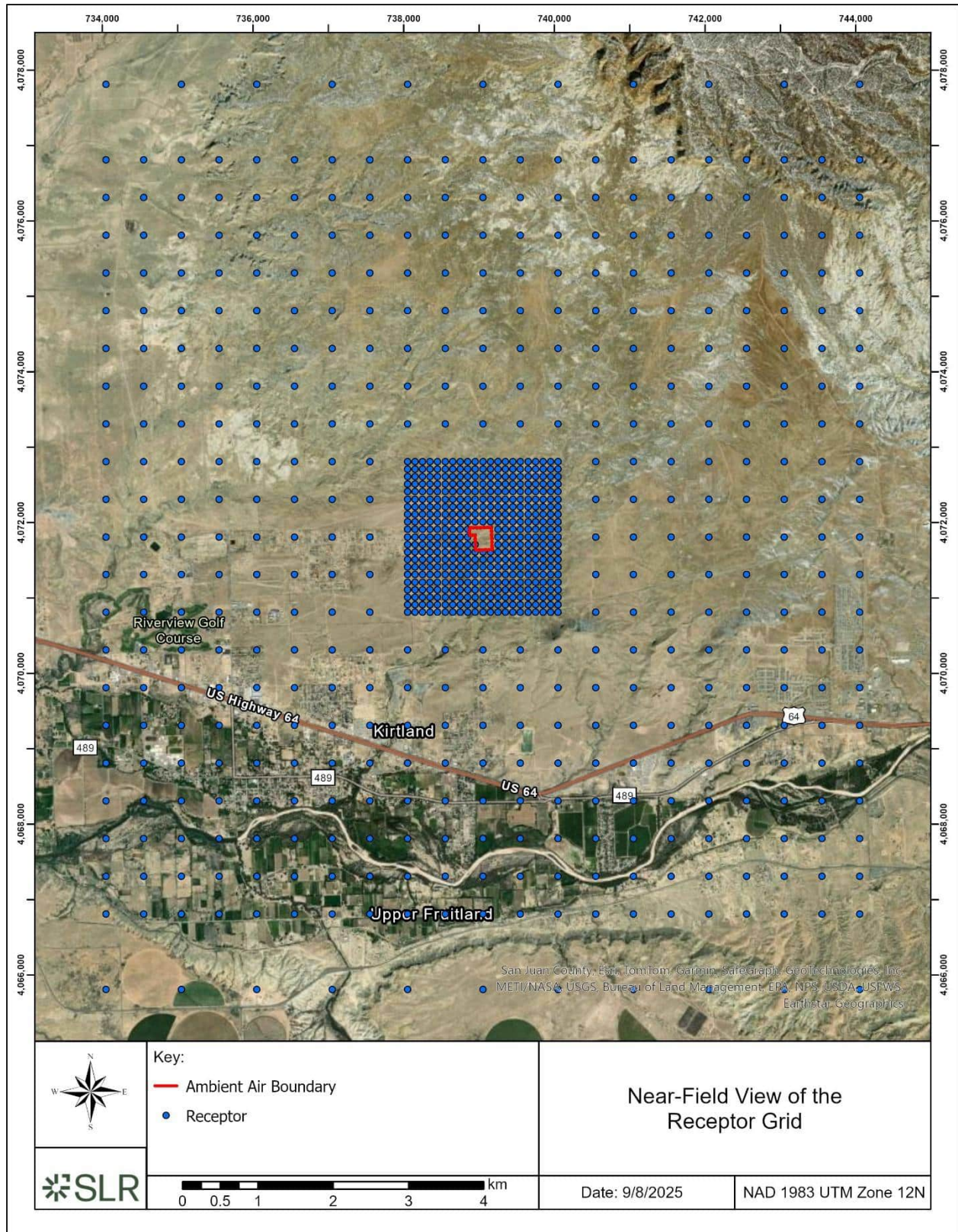


Figure 2-2 Near-Field View of the Receptor Grid



2.5 Emission Source Inventory

Project emission units at the facility are comprised of six (6) Jenbacher J620's and ten (10) Jenbacher J624's. Each engine has a dedicated stack and therefore all emission units were represented as POINT sources. All source parameters are based on design specifications.

Figure 2-3 shows the locations of the emission units.

Table 2-1 presents the stack parameters for each engine type and **Table 2-2** presents the emissions. **Figure 2-3** shows the locations of the emission units.

Table 2-1 Engine Stack Parameters

Source ID	Model ID	Source Description	Stack Height (m)	Exhaust Temperature (K)	Exit Velocity (m/s)	Stack Diameter (m)
E-1 through E-6	E_1 through E_6	Jenbacher J620	21.34	688.71	17.14	0.5080
E-7 through E-16	E_7 through E_16	Jenbacher J624	10.94	642.59	11.50	0.7112

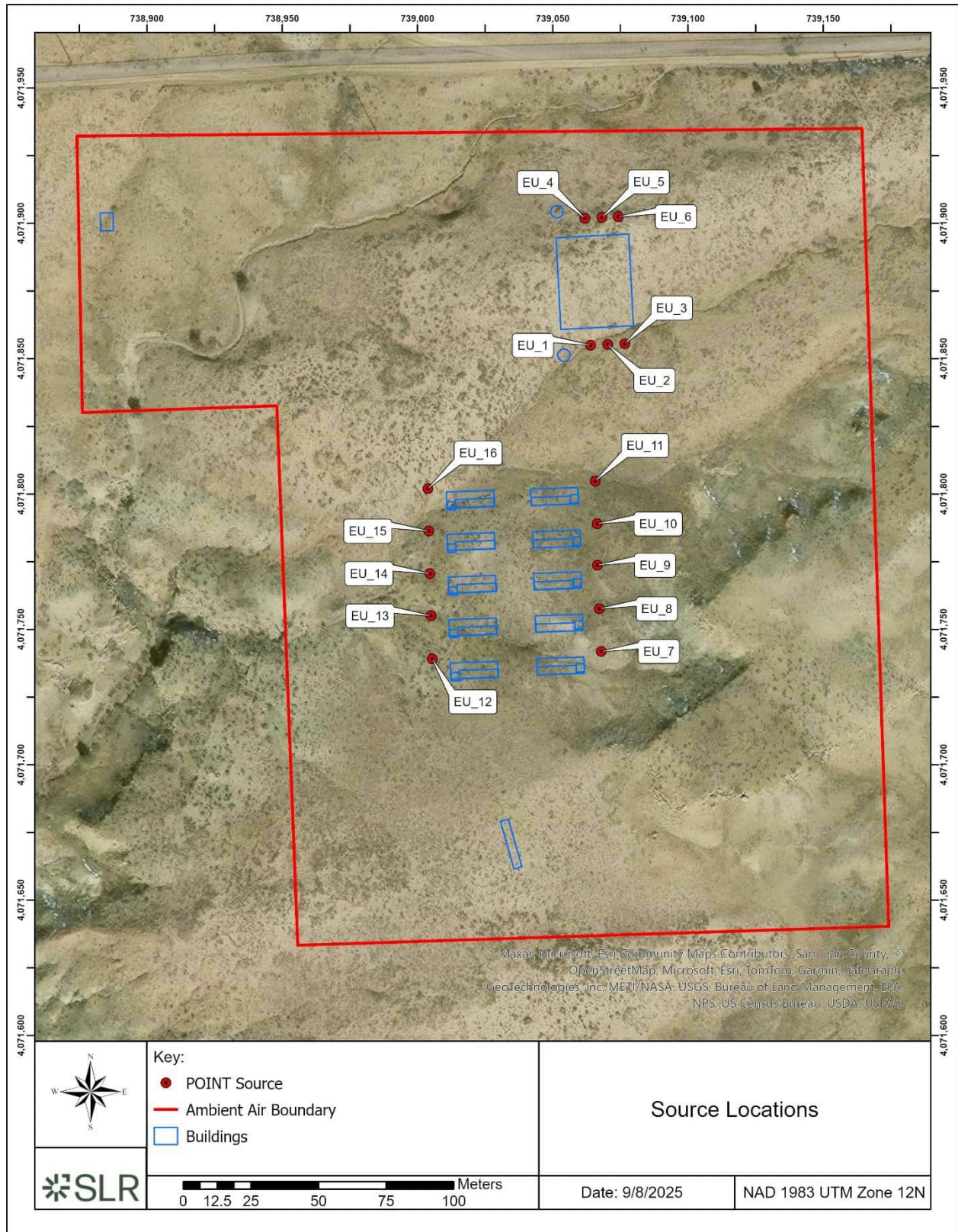
Table 2-2 Engine Emissions

Source ID	Model ID	Source Description	Emissions (g/s) ¹			
			NO ₂	PM ₁₀ /PM _{2.5}	CO	SO ₂
E-1 through E-6	E_1 through E_6	Jenbacher J620	2.38 E-01	2.56 E-04	1.76E-01	7.33 E-03
E-7 through E-16	E_7 through E_16	Jenbacher J624	3.15 E-01	3.29 E-04	2.28 E-01	9.39 E-03

1. Short-term and annual emissions are the same since the engines are being permitted to operate 8,760 hours per year



Figure 2-3 Source Locations



2.6 Plume Downwash

The effects of plume downwash were considered for all POINT sources, based on building locations and heights relative to facility emission sources. Direction-specific downwash parameters were calculated using the current version of the USEPA-approved Building Profile Input Program (BPIPPRM Version 04274). Location and dimensions were developed from engineering drawings. **Figure 2-4** shows the location of all POINT sources and structures included in the plume downwash analysis. **Table 2-3** provides the dimensions of the buildings and structures included in the analysis. BPIPPRM input and output files are included in the model file archive submitted electronically with the permit application.

In addition to calculating direction-specific building dimensions, the BPIPPRM program also calculates the Good Engineering Practice (GEP) stack height. The GEP stack height for each POINT source was calculated pursuant to the USEPA's methodology to determine "the height necessary to ensure that emissions from the stack do not result in excessive concentrations of any air pollutant in the immediate vicinity of the source as a result of atmospheric downwash, eddies or wakes which may be created by the source itself, nearby structures or nearby terrain obstacles."

Per to 40 CFR 51.1(ii), the GEP stack height is defined as the greater of:

- 65 meters, measured from the ground-level elevation at the base of the stack; or
- $H_g = H = 1.5L$, where:
 - o H_g = good engineering practice stack height, measured from the ground-level elevation at the base of the stack,
 - o H = height of nearby structure(s) measured from the ground-level elevation at the base for the stack,
 - o L = lesser dimension of the height or projected width of nearby structures.

All facility stack heights were checked to verify that they are within the GEP stack height limit.

Table 2-3 Building Dimensions

Building ID	Source Description	Tier Number	Tier Height (m)	Diameter (m)	X Length (m)	Y Length (m)	Rotation Angle (deg)
ST1	Storage Tank	1	3.66	4.57	-	-	-
ST2	Storage Tank	1	3.66	4.57	-	-	-
OFFTLR	Office Trailer	1	3.66	-	18.29	3.05	285.58
620BLD	J620 Generator Building	1	9.3	-	33.92	26.86	93.13
624CON1	J624 Generator Building	1	3	-	17.5	6	182.44
624CON1	J624 Generator Building	2	9	-	14.5	3	182.44



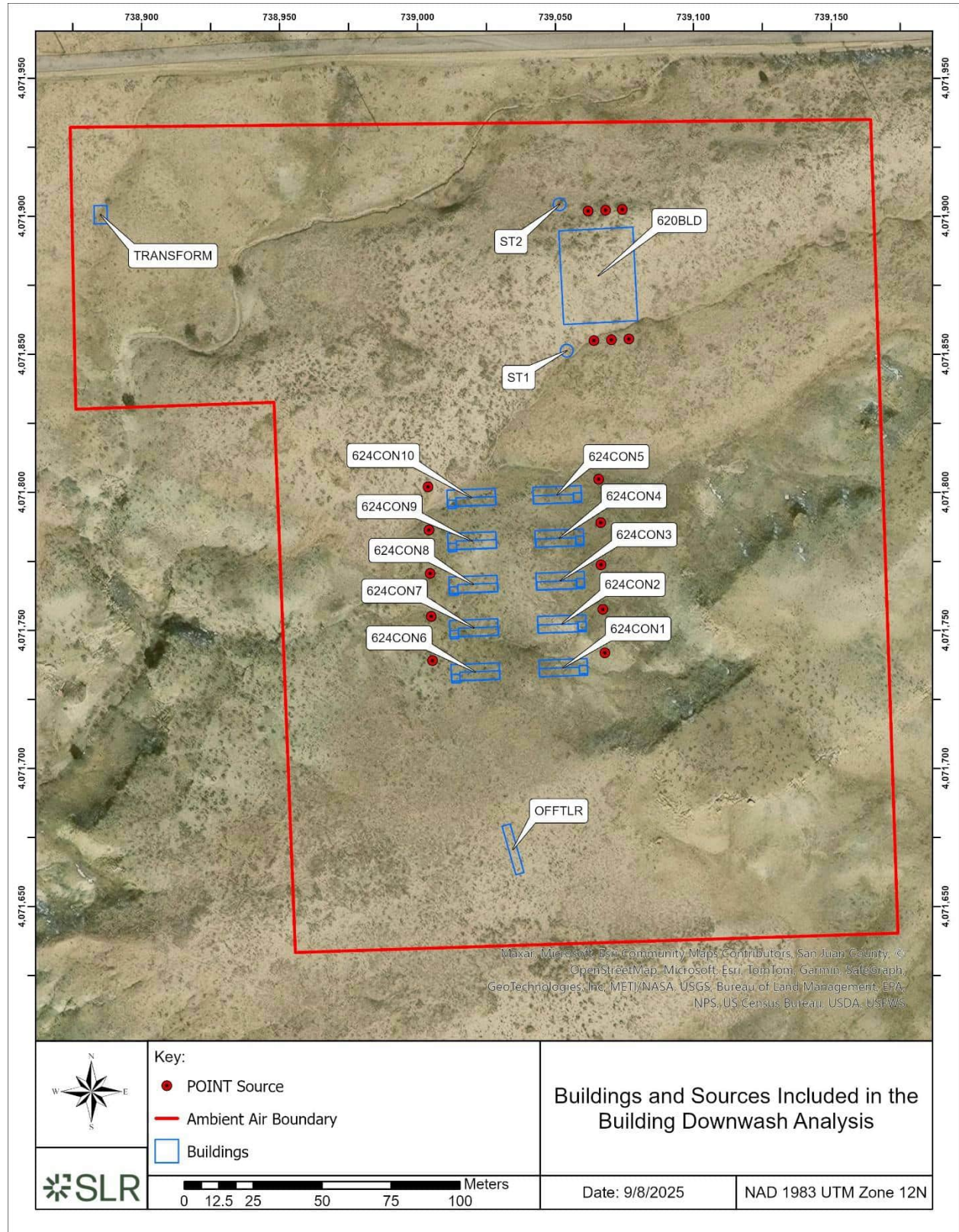
Building ID	Source Description	Tier Number	Tier Height (m)	Diameter (m)	X Length (m)	Y Length (m)	Rotation Angle (deg)
624CON1	J624 Generator Building	3	10.66	-	3	3	182.44
624CON2	J624 Generator Building	1	3	-	17.5	6	182.44
624CON2	J624 Generator Building	2	9	-	14.5	3	182.44
624CON2	J624 Generator Building	3	10.66	-	3	3	182.44
624CON3	J624 Generator Building	1	3	-	17.5	6	182.44
624CON3	J624 Generator Building	2	9	-	14.5	3	182.44
624CON3	J624 Generator Building	3	10.66	-	3	3	182.44
624CON4	J624 Generator Building	1	3	-	17.5	6	182.44
624CON4	J624 Generator Building	2	9	-	14.5	3	182.44
624CON4	J624 Generator Building	3	10.66	-	3	3	182.44
624CON5	J624 Generator Building	1	3	-	17.5	6	182.44
624CON5	J624 Generator Building	2	9	-	14.5	3	182.44
624CON5	J624 Generator Building	3	10.66	-	3	3	182.44
624CON6	J624 Generator Building	1	3	-	17.5	6	182.44
624CON6	J624 Generator Building	2	9	-	14.5	3	182.44
624CON6	J624 Generator Building	3	10.66	-	3	3	182.44
624CON7	J624 Generator Building	1	3	-	17.5	6	182.44
624CON7	J624 Generator Building	2	9	-	14.5	3	182.44
624CON7	J624 Generator Building	3	10.66	-	3	3	182.44
624CON8	J624 Generator Building	1	3	-	17.5	6	182.44
624CON8	J624 Generator Building	2	9	-	14.5	3	182.44
624CON8	J624 Generator Building	3	10.66	-	3	3	182.44



Building ID	Source Description	Tier Number	Tier Height (m)	Diameter (m)	X Length (m)	Y Length (m)	Rotation Angle (deg)
624CON9	J624 Generator Building	1	3	-	17.5	6	182.44
624CON9	J624 Generator Building	2	9	-	14.5	3	182.44
624CON9	J624 Generator Building	3	10.66	-	3	3	182.44
624CON10	J624 Generator Building	1	3	-	17.5	6	182.44
624CON10	J624 Generator Building	2	9	-	14.5	3	182.44
624CON10	J624 Generator Building	3	10.66	-	3	3	182.44
TRANSFORM	Transformer	1	4.06	-	4.7	6.58	0.88



Figure 2-4 POINT Sources and Buildings Included in the Downwash Analysis



3.0 Modeling Procedures

3.1 Significant Impact Analysis – Criteria Pollutants

A significant impact analysis was conducted for criteria pollutants to determine whether project emissions could potentially cause or contribute to a violation of a NAAQS, NMAAQs, or PSD increment; that is, exceed the significant impact levels (SILs). Maximum model concentrations resulting to project emissions were compared to the applicable SILs for CO, NO₂, PM₁₀, PM_{2.5}, and SO₂. **Table 3-1** presents the results of the Class II significant impact analysis.

If the maximum modeled concentration for a pollutant and averaging period is less than the applicable SILs, then no additional analysis is required for that pollutant and averaging period. If the maximum modeled concentration is equal to or above the SIL, then a cumulative analysis is required for that pollutant and averaging period.

The significant impact analysis shows that the project is insignificant for the following:

- 1-hour and 8-hour CO
- 24-hour PM₁₀
- 24-hour and annual PM_{2.5}
- 1-hour, 3-hour, 24-hour and Annual SO₂

As a result, no further analysis is required for these pollutants and averaging periods. The analysis also shows that the project has a significant impact for the following:

- 1-hour and annual NO₂

Therefore, a cumulative NAAQS, NMAAQs, and PSD Increment analysis was performed for NO₂.

The significant impact analysis is also used to determine the radius of influence (ROI) for each pollutant and averaging period with concentrations greater than the SIL. Per the NMED Modeling Guidelines, the ROI, is based on the most distant receptor at which the project results in model concentrations greater than the Class II area SILs. All receptors within the ROI for each pollutant and averaging period must be included in the cumulative modeling. The ROI for 1-hour NO₂ is 32.6 km and the ROI for annual NO₂ is 2.5 km.

Table 3-1 Significant Impact Analysis Results

Pollutant	Averaging Period	Model Concentration (µg/m ³)	Secondary Concentration (µg/m ³)	Total Concentration (µg/m ³)	Class II SIL ¹ (µg/m ³)
CO	1-hour	73.70	--	73.70	2,000
	8-hour	54.99	--	54.99	500
NO ₂	1-hour	78.18	--	78.18	7.52
	24-hour ²	--	--	--	5.0
	Annual	7.29	--	7.29	1.0
PM ₁₀	24-hour	0.06	--	0.06	5.0
	Annual	0.01	--	0.01	1.0



Pollutant	Averaging Period	Model Concentration (µg/m³)	Secondary Concentration (µg/m³)	Total Concentration (µg/m³)	Class II SIL ¹ (µg/m³)
PM _{2.5}	24-hour	0.05	0.0062	0.06	1.2
	Annual	0.01	0.0005	0.01	0.13
SO ₂	1-hour	2.50	--	2.50	7.8
	3-hour	2.44	--	2.44	25.0
	24-hour	1.79	--	1.79	5.0
	Annual	0.23	--	0.23	1.0
1. SILs taken from Table 18 of the NMED Modeling Guideline 2. Significant impact analysis modeling was not done for 24-hour NO₂ since compliance with the 1-hour NO₂ NAAQS shows compliance with the 24-hour NO₂ NMAAQs					

3.2 Secondary PM_{2.5} Impact Analysis

The USEPA document *Guidance for Ozone and Fine Particulate Matter Permit Modeling* (USEPA 2022) was used to develop an evaluation of the potential impacts of Project related VOC, SO₂, and NO_x emissions on the secondary formation of ozone (O₃) and PM_{2.5}. Project emissions were assessed using the information provided in the USEPA document *Clarification on the Development of Modeled Emission Rates for Precursors (MERPs) as a Tier 1 Demonstration Tool Under the PSD Permitting Program* (USEPA 2024b).

The first step in the guidance is to compare Project emissions to the MERPs. A MERP represents a level of precursor emissions that is expected to result in ambient impacts less than the applicable significant impact level (SIL) for O₃ or PM_{2.5} and is calculated as:

$$MERP = SIL \text{ Value} \times \frac{\text{Modeled emission rate from hypothetical source}}{\text{Modeled air quality impact from hypothetical source}}$$

The comparison is accomplished by summing the ratios of the Project emissions and the appropriate MERP for each precursor. If the combined ratios of the precursors are greater than one hundred percent of the SIL, then significant secondary formation is possible and needs to be quantified. The comparison for a single precursor can be represented as:

$$\text{Percent SIL} = \left[\frac{\text{Project Emissions (tpy)}}{\text{MERP (tpy)}} \right] \times 100$$

where the project emissions are those of a single precursor and the MERP represents the associated emission rate that is expected to result in ambient impacts less than the applicable SIL.

The NMED Modeling Guidelines provides MERP values based on the air quality control regions (AQCR) in New Mexico. The proposed project is in AQCR 014 and thus will use MERPs from La Plata County, Colorado. The data used to calculate the secondary impacts of O₃ and PM_{2.5} as



percent of the SIL are provided in **Table 3-2**. The results show that secondary impacts from project-related precursor emissions will not cause or contribute to a violation of the NAAQS for O₃ and PM_{2.5}.

Table 3-2 Secondary Impacts of O₃ and PM_{2.5} as Percent of the SIL

Pollutant/ Averaging Period	Precursor	Project Emissions (tpy)	MERP (tpy)	Secondary Impact ¹ (% SIL)
O ₃	NO _x	159.04	571	28.9
	VOC	46.64	4,679	
24-hour PM _{2.5}	NO _x	159.04	33,634	0.5
	SO ₂	4.79	11,410	
Annual PM _{2.5}	NO _x	159.04	43,833	0.4
	SO ₂	4.79	48,057	
1. The secondary impact as a percentage of the SIL is based on the combined impact of the individual precursors.				

Secondary impacts of PM_{2.5} must be added to the primary impacts presented in **Table 3-1** for comparison to the SIL. Secondary PM_{2.5} can be calculated by multiplying the percent SIL results in **Table 3-2** by the appropriate SIL.

$$0.5\% \text{ of } 24\text{-hour SIL} \times 1.2 \frac{\mu\text{g}}{\text{m}^3} = 0.0062 \frac{\mu\text{g}}{\text{m}^3}$$

$$0.4\% \text{ of Annual SIL} \times 0.13 \frac{\mu\text{g}}{\text{m}^3} = 0.0005 \frac{\mu\text{g}}{\text{m}^3}$$

Table 3-1 shows that summing the primary and secondary PM_{2.5} results in a concentration less than the SIL and no further evaluation of PM_{2.5} is needed.

3.3 Cumulative NAAQS, and NMAAQs Analysis

A cumulative NAAQS and NMAAQs analysis was performed for 1-hour and annual NO₂. The NAAQS and NMAAQs represent the maximum concentration allowed in ambient air for a given criteria pollutant. Cumulative modeling will include only receptors that fall within the ROI for the respective pollutant and averaging period.

Compliance with the applicable NAAQS and NMAAQs is based on the design concentration, which consists of model concentrations resulting from allowable emissions of all Plant sources and emissions from nearby inventory sources, summed with an ambient background



concentration. Per guidance from NMED modeling staff, an ambient monitoring concentration does not need to be included if nearby sources are explicitly included in the modeling.²

The design value for the 1-hour NAAQS is based on the 98th percentile of the daily maximum 1-hour concentration. The design value for the annual NMAAQs is the maximum annual concentration. Compliance with the 1-hour NAAQS also demonstrates compliance with the 24-hour NMAAQs. Compliance with the annual NMAAQs demonstrates compliance with the annual NAAQS.

3.4 Background Concentrations

Per Appendix W Section 8.3, the criteria pollutant background concentrations should include:

- Nearby sources – defined as sources located in the vicinity of the project source that are not adequately represented by ambient monitoring data. These are sources are explicitly included in the cumulative modeling analysis.
- Other Sources – defined as the portion of the background attributable to natural sources, unidentified sources, and regional transport captured in adequately representative ambient monitoring data.

3.4.1 Nearby Source Inventory

The cumulative NAAQS and NMAAQs analyses must account for nearby sources located in the vicinity of the Plant area. These sources will be explicitly included in the modeling analysis.

NMED maintains an inventory of source data and emissions for sources located in New Mexico. The data is made available through the MergeMaster Source Retrieval website where the user can query the database by entering the coordinates of a location of interest. The MergeMaster website will produce AERMOD model-ready input files for all criteria pollutants that contain model information for sources within 25 km of the point of interest and “very large sources” within 50 km. Only those sources included in the “NAAQS” source group in the model-ready files were included in the NAAQS and NMAAQs analysis.

3.4.2 Ambient Background Concentrations

As noted previously, NMED modeling staff has indicated that an ambient monitoring concentration does not need to be included if nearby sources are explicitly included in the modeling. Therefore, no ambient monitor concentrations were needed.

3.4.3 NAAQS and NMAAQs Analysis Results

The results of the cumulative NAAQS and NMAAQs analysis show that the design concentration for annual NO₂ is in compliance with the annual NO₂ NMAAQs and thus demonstrates compliance with the annual NO₂ NAAQS. Conversely, the model results show exceedances of the 1-hour NO₂ NAAQS. Therefore, a culpability analysis was performed to show that the nearby source inventory dominates the model results and that facility sources do not have a significant contribution to the predicted exceedance.

For 1-hour NO₂, there are thirteen (13) receptor locations at which a predicted NAAQS exceedance has occurred. Using the MAXDCONT keyword in AERMOD, the culpability was calculated at each receptor for facility sources and nearby inventory for the high 8th high

² Email correspondence from Sufi Mustafa (NMED) to Matthew Stresing (SLR) on 05/30/2025



concentration rank through the high 40th high rank, the rank at which all receptor locations have a design concentration lower than the NAAQS. The culpability analysis shows that the maximum facility contribution at any of the 13 receptor locations and at any rank is 2.04 µg/m³, well below the 1-hour NO₂ SIL of 7.5 µg/m³. Therefore, the facility does not cause or contribute to the predicted exceedance of the 1-hour NO₂ NAAQS.

The results of the NAAQS analysis are presented in **Table 3-3**. The 1-hour NO₂ results represents the high 8th high concentration at which the Plant has a significant contribution to the results. The annual NO₂ result is the maximum annual concentration.

Table 3-3 NAAQS and NMAAQs Analysis Results

Pollutant	Averaging Period	Facility Concentration (µg/m ³)	Nearby Concentration (µg/m ³)	Total Concentration (µg/m ³)	NAAQS/NMAAQs (µg/m ³)
NO ₂	1-hour	62.21	16.59	78.80	188/--
	Annual	0.51	22.65	23.16	99.66/94.02
1. 1-hour NO ₂ is the highest of the eighth highest concentration (H8H) averaged over all meteorological years					

3.5 Cumulative Class II PSD Increment Analysis

A cumulative PSD increment analysis was performed for annual NO₂. The PSD increment represents the maximum amount the concentration of a given pollutant is allowed to increase above a baseline concentration for a pollutant. Cumulative modeling includes only receptors within the ROI for annual NO₂.

Compliance with the applicable PSD increment is based on the model concentration considering emissions from all facility sources and nearby increment consuming and expanding inventory sources. The nearby source inventory from MergeMaster described in **Section 3.4.1** were used for the PSD increment analysis. Only those sources included in the “PSD” source group in the model-ready files were included in the PSD increment analysis.

Compliance with the annual NO₂ PSD increment is demonstrated by comparing the maximum annual model concentration to the applicable increment. The results of the PSD increment analysis are presented in **Table 3-4**.

Table 3-4 PSD Increment Analysis Results

Pollutant	Averaging Period	Facility Contribution (µg/m ³)	Offsite Contribution (µg/m ³)	Total Concentration (µg/m ³)	Class II PSD Increment (µg/m ³)
NO ₂	Annual	0.51	20.86	21.37	25
1. Annual NO ₂ : Maximum annual concentration.					



3.6 Air Toxics Modeling

Source-only modeling must be provided for any toxic air pollutant sources that may emit any toxic pollutant in excess of the emission levels specified in 20.2.72.502 NMAC. Based on project emissions, an air toxics analysis was performed for ammonia.

Modeling was conducted using the methodologies presented in Section 2.0 of this modeling report. Compliance is demonstrated if the 8-hour model concentration is less than one percent (1%) of the Occupational Exposure Level (OEL) listed in 20.2.72.502 NMAC for ammonia of 18 mg/m³, or 180 µg/m³.

The maximum 8-hour model concentration for ammonia is 14.27 µg/m³, well below 1% of the OEL.



4.0 References

NMED, 2024. *New Mexico Air Quality Bureau Air Dispersion Modeling Guidelines*. June 2024.

USEPA, 2024. *Guideline on Air Quality Models*. Published as 40 CFR 58 Appendix W.
November 20, 2024.

USEPA, 2024b. *Clarification on the Development of Modeled Emission Rates for Precursors (MERPs) as a Tier 1 Demonstration Tool for Ozone and PM_{2.5} under the PSD Permitting Program*. Memorandum from Richard A. Wayland (Air Quality Assessment Division).
April 30, 2024

USEPA, 2022. *Guidance for Ozone and Fine Particulate Matter Permit Modeling*. Richard Wayland (Air Quality Assessment Division), Scott Mathias (Air Quality Policy Division).
July 29, 2022.



Section 17

Compliance Test History

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

To show compliance with existing NSR permits conditions, you must submit a compliance test history. The table below provides an example.

This application is for a new source of emissions, and therefore, Section 17 is not applicable.

Section 20

Other Relevant Information

Other relevant information. Use this attachment to clarify any part in the application that you think needs explaining. Reference the section, table, column, and/or field. Include any additional text, tables, calculations or clarifying information.

Additionally, the applicant may propose specific permit language for AQB consideration. In the case of a revision to an existing permit, the applicant should provide the old language and the new language in track changes format to highlight the proposed changes. If proposing language for a new facility or language for a new unit, submit the proposed operating condition(s), along with the associated monitoring, recordkeeping, and reporting conditions. In either case, please limit the proposed language to the affected portion of the permit.

There is no other relevant information being provided with this application

Section 22: Certification

Company Name: Saddle Butte Energy Farmington, LLC

I, Christian Stoddard, 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 10 day of September, 2025, upon my oath or affirmation, before a notary of the State of

Colorado.

Christian Stoddard
*Signature

9/10/25
Date

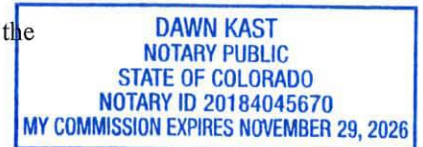
Christian Stoddard
Printed Name

Director of Planning
Title

Scribed and sworn before me on this 10th day of September, 2025.

My authorization as a notary of the State of Colorado expires on the

29th day of November, 2026.

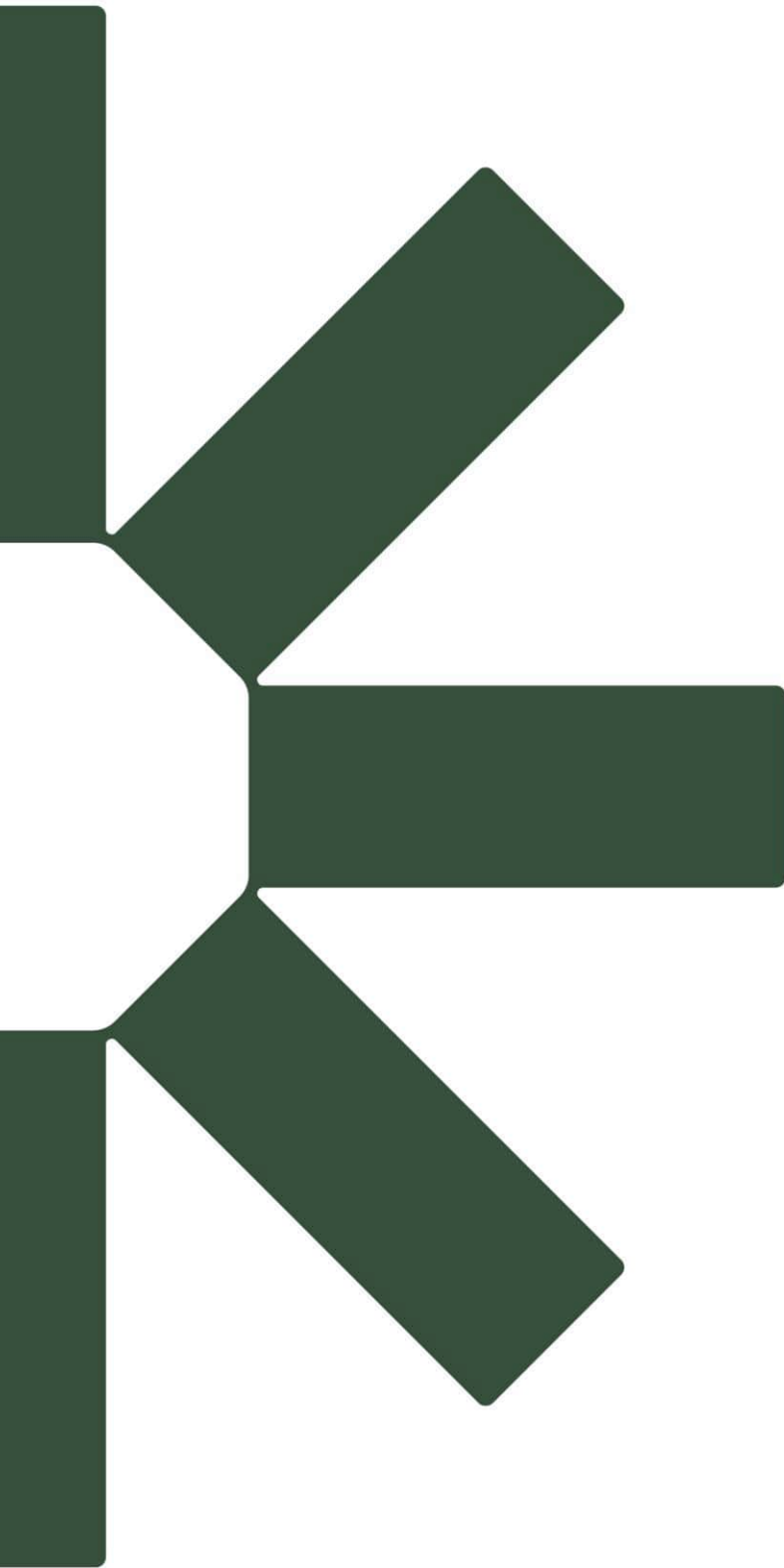


Dawn Kast
Notary's Signature

9/10/2025
Date

Dawn Kast
Notary's Printed Name

*For Title V applications, the signature must be of the Responsible Official as defined in 20.2.70.7.AE NMAC.



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