



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

**999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466**

July 8, 1999

Ref: 8P-AR

Jack Vaughn
EnerVest San Juan Operating Co.
570 B Turner Dr.
Durango, CO 81301

Dear Mr. Vaughn,

This letter is in response to your letter dated June 3, 1999 requesting clarification of the aggregation of sources for the purpose of determining Title V applicability as it applies to pipeline compressor stations. More specifically, you have asked us to determine whether we consider each emitting unit at each compressor station to be a single source or all of the emitting units at each compressor station in aggregate to be a single source for Title V permitting purposes, and whether these sources are major.

In the Code of Federal Regulations at 40 CFR 71.2 the definition of "major source" states, in part:

"Major source means any stationary source (or any group of stationary sources that are located on one or more contiguous or adjacent properties and are under common control of the same person (or persons under common control)), belonging to a single major industrial grouping....."

We interpret this to mean that each compressor station with its associated emitting units (e.g. compressor engines, wells, pumps, dehydrators, storage and transmission tanks, etc...) comprises a 'group of stationary sources' and would be considered a single source for purposes of determining Title V applicability.

With this interpretation in mind, the additional information you provided to us in the letter, and further telephone conversations with you, we have determined that the EnerVest San Juan Operating Co. has five sources (compressor stations with their associated emitting units) located within the exterior boundaries of the Southern Ute Indian Reservation in southwest Colorado. The following table illustrates the sources.

1	Blackridge Compressor Station (BR SU 8-2) SW NW Sec. 8 T33N - R10W
2	Valencia Canyon Compressor Station (VC SU 32-1) SW SE Sec. 32 T33N - R11W
3	Valencia Canyon Compressor Station (VC SU 32-4) NW NE Sec. 32 T33N - R11W
4	Valencia Canyon Compressor Station (VC SU 20-4) SE NE Sec. 20 T33N - R11W
5	Indian Creek Compressor Station (IC SU 24-4) NW SW Sec. 24 T34N - R10W

To further determine whether these are major sources for purposes of Title V permitting, we require additional information. Specifically, for each source identified above we are requesting:

- A list of all emission units for each source such as compressor engines, wells, pumps, heaters, dehydrators, tanks, emergency engines, etc.
- The date of construction and installation of all the listed equipment.
- The potential to emit of all criteria pollutants (including VOCs) and all hazardous air pollutants for each emission unit.
- A copy of any existing air pollution permits that may have been issued by the State of Colorado.

We hope that this has clarified for you our understanding of the regulations as they pertain to the EnerVest San Juan Operating Company's facilities. If you have any further questions, please feel free to contact Kathleen Paser of my Technical Assistance staff at 303-312-6526.

Sincerely,

Richard R. Long, Director
Air and Radiation Program

cc:

Cheryl Wiescamp, Director of Environmental Programs, Southern Ute Indian Tribe
Virgil Frazier, Air Program Coordinator, Southern Ute Indian Tribe