

**Air Pollution Control
Title V Permit to Operate
Statement of Basis for Permit No. V-SUIT-0046-2014.01
Minor Permit Revision
May 18, 2015**



**Samson Resources Company
Worford Ridge Compressor Station
Southern Ute Indian Reservation
La Plata County, Colorado**

Description of Permit Revision:

On February 18, 2015, the Southern Ute Indian Tribe Air Quality Program (AQP) received a minor permit revision application from Samson Resources Company (Samson) for the Worford Ridge Compressor Station (Worford). Samson requested a revision to the permitting conditions of 40 CFR 63, Subpart ZZZZ (Subpart ZZZZ), to account for an engine swap which occurred on July 9, 2014. The engine swap was for emission unit C-104, previously a 1445 nameplate rated horsepower Waukesha L5794LT four-stroke lean-burn stationary reciprocating internal combustion engine (RICE) manufactured in March 2004, which was replaced by a Waukesha engine of the same model and horsepower but manufactured at a later date in January 2007.

This engine swap did not meet the criteria for an off-permit change under the engine replacement alternative operating scenario requirements of permit condition III.C, because the newer replacement engine is subject to different regulatory applicabilities under Subpart ZZZZ than the engine that was removed. Therefore, Samson applied for a minor permit revision, according the requirements of RAC 2-111(3).

Under Subpart ZZZZ, the engine removed was considered an existing, non-emergency, non-black start four-stroke lean-burn (4SLB) remote stationary RICE with a site rating greater than 500 brake horsepower located at an area source of hazardous air pollutants (HAPs), subject to maintenance and work practice standards only. The replacement engine is a new 4SLB stationary RICE located at an area source of HAPs under Subpart ZZZZ. Per §63.6590(c) this category of engine must meet the requirements of Subpart ZZZZ by meeting the requirements of 40 CFR Part 60, Subpart JJJJ (Subpart JJJJ). However, under Subpart JJJJ, as outlined in §60.4230(3)(i), lean burn engines with a maximum engine power greater than 500 HP manufactured prior to July 1, 2007 have no applicable requirements. Therefore, no requirements of Subpart JJJJ are included in this revised operating permit

The permit has been revised to reflect the updated applicability for emission unit C-104. Specifically, emission unit C-104 has been removed from the Subpart ZZZZ permit conditions. AQP is making these revisions as a minor permit revision in accordance with RAC 2-111(3). The permit is being reissued as permit number V-SUIT-0046-2014.01.

For specific applicability information regarding the Part 70 permit for this facility, please reference the Statement of Basis for permit number V-SUIT-0046-2014.00.