Public Notice



PROPOSED PART 71 PERMIT ELK OPERTING SERVICES – McELMO CREEK UNIT LOCATED NEAR MONTEZUMA CREEK, SAN JUAN COUNTY, UT



The Navajo Nation Environmental Protection Agency (NNEPA), Navajo Air Quality Control Program (NAQCP), Operating Permit Program (OPP) is accepting written comments on the proposed Part 71 permit for Elk Operating Services, LLC – McElmo Creek Unit.

The McElmo Creek Unit (MCU) Oil Production Facility is an oil and gas production operation located near the city of Aneth in San Juan County, Utah on the Navajo Nation. The facility was initially constructed in 1950's and has undergone several ownership changes. In 2018 Elk Operating Services became the current owner and operator of the facility. The facility is located on the MCU oil field, which includes field operations, a gas compression plant, and a water injection plant. The field operations consist of 90 producing wells where petroleum crude oil is recovered and stored at either a satellite tank battery or a main tank battery. The gas compression (and re-injection) plant serves as a tertiary enhanced oil recovery operation for the MCU oilfield. The compressor station compresses CO2-rich natural gas from upstream production facilities and reinjectes the gas back with produced water from the Water Injection Plant, through a dual injection system. This Part 71 permit will cover the MCU Central Facility and the Water Injection Plant but not their field operations due to US EPA's Source Determination for Certain Emission Units in the Oil and Natural Gas Sector (81 FR 35622: August 2, 2016), which states that adjacent emitting equipment must be within ¹/₄ miles of each other. The field operations fall out of the ¹/₄ mile range to be covered. This will be the first Part 71 permit issued to this facility, which is currently operating under a revised Prevention of Significant Deterioration (PSD) permit (NU 05-01) and a Tribal Minor New Source Review (TMNSR) permit (C-2020-2) issued by USEPA on June 8, 2020. This notice of draft Part 71 permit fulfills the public notice procedure to which the draft permit is subject.

Written comments, written requests for a public hearing, written requests for notification of the final decision regarding these permit actions, or inquiries or requests for additional information regarding these permit actions should be directed to Natasha Yazzie (<u>nyazzie1@navajo-nsn.gov</u>), by phone at (928) 729-4248, or by mail to NAQCP/OPP P.O. Box 529, Fort Defiance, AZ 86504. Written comments and/or written requests must be received by 5:00 pm (MST), November 25, 2022. Written comments will be considered prior to final permit decision and permit issuance. A public workshop will be held at Aneth Chapter House on November 9, 2022 (10am to 2pm).

If NNEPA finds a significant degree of public interest, a public hearing will be held. NNEPA will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

Applications, proposed air permits, and accompanying statements of basis are available for review from the NNEPA/OPP website at: <u>https://navajoepa.org/air-quality-control-program</u>. These materials may also be viewed in person at NNEPA, NAQCP/OPP building Route 112, Bldg. # 2837 Fort Defiance, AZ 86504. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays).

Persons wishing to be included on the NAQCP permit public notice mailing list should contact Angie Frank in writing at NAQCP/OPP at the above address, by phone at (928) 729-4096, or by email at angiefrank@navajo-nsn.gov.