



Statement of Basis/Data Base Summary

GCP-Oil & Gas (O&G) Permit

Facility Classification
Synthetic Minor - >80%

Permit Writer: Todd Sherrill
GCP No. 7426M3
Agency Interest No. 38004 - PRN20250001
AIRS ID No. 350151756
SIC Code: 1321: Natural gas liquids
Facility Type: O&G-Gas Plant
Company: Pronto Midstream, LLC
Facility: Marlan Gas Plant
Type of Permit Action: GCP - Oil and Gas Revision
Registration Date: AQB ePermitting Portal
Receive Date: January 15, 2025
Co. Pub Notice Date/Paper: NA
Public Hearing: NA
Permit Due: February 14, 2025
Permit Issued: March 7, 2025

Facility Location: Located at 55 Buffalo Grass Rd., Carlsbad, NM 88220. The facility can be reached from Carlsbad via the US-180 East/US-62 East and turning left onto NM-243/SH-176.

UTM Zone: 13
UTM Easting: 610000 meters
UTM Northing: 3600310 meters
Elevation: 3560 ft feet
County: Eddy

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1.0 Registration Summary:

Pronto Midstream, LLC (Pronto) is submitting this GCP O&G modification application for its Marlan Gas Plant (Marlan). The facility is located 25 miles northeast of Carlsbad, NM in Eddy County. Pronto will be updating emissions from the amine treating units at both Train 1 and Train 2 using a new ProMax simulation and methodologies. Pronto will be increasing the gas destruction efficiency for FLARE-01, FLARE-02, and ECD-02. Pronto will be lowering the heat input rates for HT-04, HT-05, and HT-06. Pronto will be updating the tank size for PWTANK-03 & PWTANK-04 and removing PWTANK-05 & PWTANK-06. The proposed facility wide throughputs of the facility will be 272 MMSCFD for gas, 2,221 bbl/d for condensate, and 2,035 bbl/d for produced water.

2.0 Description of Modification:

The following units will be modified at this facility:

- One (1) 60 MMscfd amine treating unit (Unit AMINE-01);
- One (1) 75 MMbtu/hr hot oil heater (Unit HT-04);
- One (1) 27.563 MMbtu/hr trim heater (Unit HT-05);
- One (1) 17.947 MMbtu/hr mol sieve heater (Unit HT-06);
- Four (4) 400 bbl condensate tanks (Units OILTANK-01 - 04);
- Condensate loading emissions (Unit OILLOAD-01);
- One (1) amine oxidizer (Unit TO-01);
- One (1) facility flare (Unit FLARE-01);
- One (1) 200 MMscfd amine treating unit (Unit AMINE-02);
- Two (2) 750 bbl condensate tanks (Units OILTANK-05 - 06);
- Two (2) 750 bbl produced water tanks (Units PWTANK-05 – 06);
- Condensate loading emissions (Unit OILLOAD-02);
- One (1) amine oxidizer (Unit TO-02);
- One (1) facility flare (Unit FLARE-02)

3.0 History (In descending chronological order)

Permit Number	Issue Date	Action Type	Description of Action (Changes)
7426M3	3/7/2025	GCP O&G	The following units will be modified at this facility: <ul style="list-style-type: none"> • One (1) 60 MMscfd amine treating unit (Unit AMINE-01); • One (1) 75 MMbtu/hr hot oil heater (Unit HT-04); • One (1) 27.563 MMbtu/hr trim heater (Unit HT-05); • One (1) 17.947 MMbtu/hr mol sieve heater (Unit HT-06); • Four (4) 400 bbl condensate tanks (Units OILTANK-01 - 04); • Condensate loading emissions (Unit OILLOAD-01); • One (1) amine oxidizer (Unit TO-01); • One (1) facility flare (Unit FLARE-01); • One (1) 200 MMscfd amine treating unit (Unit AMINE-02); • Two (2) 750 bbl condensate tanks (Units OILTANK-05 - 06); • Two (2) 750 bbl produced water tanks (Units PWTANK-05 – 06); • Condensate loading emissions (Unit OILLOAD-02); • One (1) amine oxidizer (Unit TO-02); • One (1) facility flare (Unit FLARE-02)
7426M2	11/16/2023	GCP O&G – Revision	Pronto will be adding another train to the facility. The equipment previously permitted will be known as Train 1, and the new equipment will be known as Train 2. Pronto will be increasing the gas throughput of Train 1 from 60 MMSCFD to 70 MMSCFD. Train 2 will have a gas throughput of 200 MMSCFD, a condensate throughput of 1682 bbl/d, and a produced water throughput of 100 bbl/d. The proposed facility wide throughputs of the facility will be 270 MMSCFD for gas, 2,024 bbl/d for condensate, and 128 bbl/d for produced water. The existing units at this facility will also be modified based on a new ProMax simulation and methodologies.
7426M1R3	9/2/2023	Admin. Revision	CE-1 like-kind engine replacement. 4ZS01395 to serial number 3XF00092
7426M1R2	11/22/2022	Admin. Revision	CE-2 like-kind engine replacement. 4ZS01363 to serial number 3XF00328. Also, name change from Lane Gas Plant to Marlan Gas Plant.
7426M1R1	8/12/2022	Admin. Revision	Ownership changes to Pronto Midstream, LLC
7426M1	7/2/2020	GCP O&G – New	Issue new GCP O&G
7426	12/20/2018	GCP4	Form C of GCP4 issued

4.0 Public Response/Concerns: As of March 7, 2025 this permit writer is not aware of any public comment or concern.

5.0 Facility Specifications:

Total Pollutant Emissions from Entire Facility (for information only, not an enforceable condition):

Pollutant	Emissions (tons per year)	Emission Type
Carbon Monoxide	94.94	Allowable
Hydrogen sulfide (NMAAQ)	.69	Allowable
Nitrogen Dioxide	87.09	Allowable
Particulate Matter (10 microns or less)	9.44	Allowable
Particulate Matter (2.5 microns or less)	8.44	Allowable
Sulfur Dioxide	68.28	Allowable
Volatile Organic Compounds (VOC)	123.22	Allowable

Total HAPS* and NM TAPS that exceed 1.0 ton per year (for information only, not an enforceable condition):

Pollutant	Emissions (tons per year)	Emission Type
Acetaldehyde; (Ethyl aldehyde)	.48	Potential
Benzene	5.43	Potential
Formaldehyde	1.58	Potential
Hexane	9.68	Potential
Toluene; (Methyl benzene)	2.19	Potential
Total HAP	17.92	Potential
Xylenes (total); (Xylol)	0	Potential

* HAP emissions are already included in VOC emissions

Note: The Total HAPS may not match the sum of the individual HAPS in this table as it will include values from HAPS that are below 1.0 tpy.

Air Pollution Control Devices:

Subject Item ID, Type, ID, (Unit #)	SI Description	Primary	Secondary
AMINE-01 (EQPT11)	Amine Treating Unit	Thermal Oxidizer (Incinerator)	Flare
AMINE-02 (EQPT20)	Amine Treating Unit	Incinerator	Flare
CE-01 (EQPT19)	Compressor Engine	Catalytic Oxidation	
CE-02 (EQPT18)	Compressor Engine	Catalytic Oxidation	
CE-03 (EQPT3)	Compressor Engine	Catalytic Oxidation	
DEHY-01 (EQPT21)	TEG Dehydrator	Thermal Oxidizer (Incinerator)	Flare
OILLOAD-01 (EQPT13)	Loading Condensate	Incinerator	
OILLOAD-02 (EQPT27)	Condensate Truck Loading	Incinerator	
OILTANK-01 - 04 (EQPT5)	Tanks Condensate 4 x 400 bbl	Incinerator	
OILTANK-05 - 06 (EQPT28)	Condensate Tanks 2 x 750 bbl	Incinerator	
PWTANK-01 - 02 (EQPT15)	Tanks Water 2 x 400 bbl	Incinerator	
PWTANK-03 - 04 (EQPT29)	Produced Water Tank 2 x 750 bbl	Incinerator	

Equipment Specifications (Active):

Unit No.	Unit Type	Manufacturer	Model No.	Serial No.	Yr of Construction	Yr of Manufacture	Operating Rate Max/Site	Operating Capacity Max/Site	Subject Item Status	Subject Item Description
AMINE-01 EQPT11	Amine sweetening unit	TBD	TBD	TBD	01-NOV-18		/	60 MM SCFD / 60 MM SCFD	Active	Amine Treating Unit
AMINE-02 EQPT20	Amine sweetening unit	Interstate treating, Inc.	600 gpm	TBD			/	200 MM SCFD / 200 MM SCFD	Active	Amine Treating Unit

Unit No.	Unit Type	Manufacturer	Model No.	Serial No.	Yr of Construction	Yr of Manufacture	Operating Rate Max/Site	Operating Capacity Max/Site	Subject Item Status	Subject Item Description
CE-01 EQPT19	Internal combustion engine	Caterpillar	G3606A3	3XF00328	06-OCT-22	04-OCT-22	/	1775 hp / 1775 hp	Active	Compressor Engine
CE-02 EQPT18	Internal combustion engine	Caterpillar	G3606 A3	3XF00092	22-AUG-23	01-JUL-22	/	1775 hp / 1775 hp	Active	Compressor Engine
CE-03 EQPT3	Internal combustion engine	Caterpillar	G3606 A3	4ZS01394	01-NOV-18	01-JAN-10	/	1775 hp / 1775 hp	Active	Compressor Engine
DEHY-01 EQPT21	Glycol Dehy Still Vent/Flash Tank	Interstate treating, Inc.	38 gpm	TBD			/	200 MM SCFD / 200 MM SCFD	Active	TEG Dehydrator
ECD-01 EQPT12	Heater	Cimarron Energy	48HVECD	5904076	01-NOV-18	01-MAR-18	/	5.24 MM BTU/h / 5.24 MM BTU/h	Active	Tanks Combustor
ECD-02 EQPT33	Enclosed Combustion Device	TBD	TBD	TBD			/	3.27 MM BTU/h / 3.27 MM BTU/h	Active	Tank Combustor
FLARE-01 EQPT34	Process Flare	Zeeco, Inc.	UFAA-24-195	32564-001	01-NOV-18	01-JAN-17	/	9600 MM BTU/h / 9600 MM BTU/h	Active	Facility Flare
FLARE-01 EQPT35	Process Flare	Zeeco, Inc.	UFAA-24-195	32564-001			/	9600 MM BTU/h / 9600 MM BTU/h	Active	Facility Flare
FLARE-02 EQPT23	Process Flare	TBD	TBD	TBD			/	14.12 MM BTU/h / 14.12 MM BTU/h	Active	Facility Flare
FLARE-02 EQPT32	Process Flare	TBD	TBD	TBD			/	14.12 MM BTU/h / 14.12 MM BTU/h	Active	Facility Flare

Unit No.	Unit Type	Manufacturer	Model No.	Serial No.	Yr of Construction	Yr of Manufacture	Operating Rate Max/Site	Operating Capacity Max/Site	Subject Item Status	Subject Item Description
FUG-01 RPNT1	Fugitives	N/A	N/A	N/A			/	/	Active	Fugitive Emissions
FUG-02 RPNT4	Fugitives	N/A	N/A	N/A			/	/	Active	Fugitive Emissions
HT-01 EQPT7	Heater	Optimized Process Furnaces, Inc	H-1610	J171186	01-NOV-18		/	39.4 MM BTU/h / 39.4 MM BTU/h	Active	Amine Hot Oil Heater
HT-02 EQPT10	Process Heater	Fulton Thermal Corporation	600S-LF-LN	86770	01-NOV-18	01-JAN-17	/	6.8 MM BTU/h / 6.8 MM BTU/h	Active	Cryo Hot Oil Heater
HT-03 EQPT9	Heater	Fulton Thermal Corporation	600S-RGN-LN	19949-1	01-NOV-18	01-JAN-17	/	7.5 MM BTU/h / 7.5 MM BTU/h	Active	Regenerator Gas Heater
HT-04 EQPT24	Heater	DEVCO HELIFLO	TBD	TBD		01-MAR-21	/	75 MM BTU/h / 75 MM BTU/h	Active	Hot Oil Heater
HT-05 EQPT25	Heater	ASTEC	HEATEC HCI-12010-10-G	22008		01-MAR-22	/	27.56 MM BTU/h / 27.56 MM BTU/h	Active	Trim Heater
HT-06 EQPT26	Heater	ASTEC	HEATEC HCI-12010-10-G	22007		01-MAR-22	/	17.95 MM BTU/h / 17.95 MM BTU/h	Active	Mol Sieve Heater
MALFUNCTION RPNT3	Fugitives	NA	NA	NA			/	/	Active	Malfunction
MSS-01 RPNT2	Fugitives	N/A	N/A	N/A			/	/	Active	Start-up, Shutdown, & Maintenance
NRU-01 RPNT5	Fugitives	N/A	N/A	N/A			/	/	Active	Nitrogen Rejection Unit

Unit No.	Unit Type	Manufacturer	Model No.	Serial No.	Yr of Construction	Yr of Manufacture	Operating Rate Max/Site	Operating Capacity Max/Site	Subject Item Status	Subject Item Description
OILLOAD-01 EQPT13	Loading/Unloading Rack	N/A	N/A	N/A			/	124773 bbl/y / 124773 bbl/y	Active	Loading Condensate
OILLOAD-02 EQPT27	Loading/Unloading Rack	N/A	N/A	N/A			/	614295 bbl/y / 614296 bbl/y	Active	Condensate Truck Loading
OILTANK-01 - 04 EQPT5	Tank - Above Ground	TBD	TBD	TBD	01-NOV-18		/	400 bbl / 5242.86 M gal/y	Active	Tanks Condensate 4 x 400 bbl
OILTANK-05 - 06 EQPT28	Tank - Above Ground	TBD	TBD	TBD			/	750 bbl / 28800.78 M gal/y	Active	Condensate Tanks 2 x 750 bbl
PWTANK-01 - 02 EQPT15	Tank - Above Ground	TBD	TBD	TBD	01-NOV-18		/	400 bbl / 429.24 M gal/y	Active	Tanks Water 2 x 400 bbl
PWTANK-03 - 04 EQPT29	Tank - Above Ground	TBD	TBD	TBD			/	750 bbl / 30863.28 M gal/y	Active	Produced Water Tank 2 x 750 bbl
REB-01 EQPT30	Glycol Dehy Reboiler Burner	TBD	TBD	TBD			/	3.75 MM BTU/h / 3.75 MM BTU/h	Active	TEG Dehy Reboiler
ROAD-01 AREA2	Unpaved roads	N/A	N/A	N/A			/	/	Active	Unpaved Haul Roads
ROAD-02 AREA3	Unpaved roads	N/A	N/A	N/A			/	/	Active	Unpaved Haul Roads
TO-01 EQPT14	Thermal Oxidizer (Incinerator)	Zeeco, Inc.	TO-1526	32985	01-NOV-18		/	7.5 MM BTU/h / 7.5 MM BTU/h	Active	Amine Oxidizer 7.5 MMBtu/hr
TO-02 EQPT31	Thermal Oxidizer (Incinerator)	TBD	TBD	TBD			/	13.13 MM BTU/h / 13.13 MM BTU/h	Active	Amine and Dehy Oxidizer

Equipment Specifications (Retired/Removed):

Unit No.	Unit Type	Manufacturer	Model No.	Serial No.	Yr of Construction	Yr of Manufacture	Operating Rate Max/Site	Operating Capacity Max/Site	Subject Item Status	Subject Item Description
CONT1 FLARE-01	Emergency Flare	Zeeco, Inc.	UFAA-24-195	32564-001	01-NOV-18	01-JAN-17	/	9600 MM BTU/h / 9600 MM BTU/h	Removed	Removed-Facility Flare
CONT2 FLARE-01	Emergency Flare	Zeeco, Inc.	UFAA-24-195	32564-001	01-NOV-18	01-JAN-17	/	9600 MM BTU/h / 9600 MM BTU/h	Removed	Removed-Facility Flare
EQPT22 ECD-02	Incinerator	TBD	TBD	TBD			/	3.27 MM BTU/h / 3.27 MM BTU/h	Removed	Removed-Tank Combustor

Emissions: Pollutant **Permitted** (Allowable and SSM) Emissions per piece of equipment or Subject Item as represented by applicant.

Unit No.	NO _x (pph)	¹ NO _x (tpy)	CO (pph)	CO (tpy)	VOC (pph)	VOC (tpy)	SO ₂ (pph)	SO ₂ (tpy)	PM ₁₀ (pph)	PM ₁₀ (tpy)	PM _{2.5} (pph)	PM _{2.5} (tpy)	H ₂ S (pph)	H ₂ S (tpy)
AMINE-01 (EQPT11)														
AMINE-02 (EQPT20)														
CE-01 (EQPT19)	1.96	8.57	.74	3.26	1.33	5.82	.076	.33	.13	.59	.13	.59		
CE-02 (EQPT18)	1.96	8.57	.74	3.26	1.33	5.82	.076	.33	.13	.59	.13	.59		
CE-03 (EQPT3)	1.96	8.57	.74	3.26	1.33	5.82	.076	.33	.13	.59	.13	.59		
DEHY-01 (EQPT21)														
ECD-01 (EQPT12)	.21	.94	.18	.79	.11	.48	.011	.05	.016	.072	.016	.072		

Unit No.	NO _x (pph)	¹ NO _x (tpy)	CO (pph)	CO (tpy)	VOC (pph)	VOC (tpy)	SO ₂ (pph)	SO ₂ (tpy)	PM ₁₀ (pph)	PM ₁₀ (tpy)	PM _{2.5} (pph)	PM _{2.5} (tpy)	H ₂ S (pph)	H ₂ S (tpy)
ECD-02 (EQPT22)														
ECD-02 (EQPT33)	.68	2.96	.57	2.49	.42	1.86	.0006	.0025	.051	.23	.051	.23		
FLARE-01 (CONT1)														
FLARE-01 (CONT2)														
FLARE-01 (EQPT34)		.71		3.23		4.08								
FLARE-01 (EQPT35)	.01	.042	.043	.19			.0008	.0034						
FLARE-02 (EQPT23)	.01	.042	.043	.19			.0008	.0034						
FLARE-02 (EQPT32)		2.94		7.94		4.82		3.62						.04
FUG-01 (RPNT1)					4.43	19.39								
FUG-02 (RPNT4)					3.7	16.2							.0001	.0004
HT-01 (EQPT7)	1.93	8.46	3.24	14.21	.21	.93	.22	.97	.29	1.29	.29	1.29		
HT-02 (EQPT10)	.33	1.46	.56	2.45	.037	.16	.038	.17	.051	.22	.051	.22		
HT-03 (EQPT9)	.37	1.61	.62	2.71	.04	.18	.042	.18	.056	.24	.056	.24		
HT-04 (EQPT24)	2.7	11.81	4.53	19.84	.3	1.3	.31	1.35	.41	1.79	.41	1.79		

Unit No.	NO _x (pph)	¹ NO _x (tpy)	CO (pph)	CO (tpy)	VOC (pph)	VOC (tpy)	SO ₂ (pph)	SO ₂ (tpy)	PM ₁₀ (pph)	PM ₁₀ (tpy)	PM _{2.5} (pph)	PM _{2.5} (tpy)	H ₂ S (pph)	H ₂ S (tpy)
HT-05 (EQPT25)	.86	3.78	1.45	6.36	.1	.42	.1	.43	.13	.58	.13	.58		
HT-06 (EQPT26)	.88	3.85	1.48	6.47	.1	.42	.1	.44	.13	.59	.13	.59		
MALFUNCTI ON (RPNT3)						10								
MSS-01 (RPNT2)						8								
NRU-01 (RPNT5)					.48	2.1								
OILLOAD-01 (EQPT13)					.62	.22								
OILLOAD-02 (EQPT27)					.1	.19								
OILTANK-01 - 04 (EQPT5)					3.36	5.98								
OILTANK-05 - 06 (EQPT28)					13.37	5.58								
PWTANK-01 - 02 (EQPT15)					.039	.07								
PWTANK-03 - 04 (EQPT29)					5.12	2.14								
REB-01 (EQPT30)	.37	1.61	.31	1.35	.02	.089	.021	.092	.028	.12	.028	.12		

Unit No.	NO _x (pph)	¹ NO _x (tpy)	CO (pph)	CO (tpy)	VOC (pph)	VOC (tpy)	SO ₂ (pph)	SO ₂ (tpy)	PM ₁₀ (pph)	PM ₁₀ (tpy)	PM _{2.5} (pph)	PM _{2.5} (tpy)	H ₂ S (pph)	H ₂ S (tpy)
ROAD-01 (AREA2)									1.1	.17	.11	.017		
ROAD-02 (AREA3)									.59	.94	.059	.094		
TO-01 (EQPT14)	4.11	9	3.29	7.2	1.11	2.43	.023	.05	.306	.67	.306	.67		
TO-02 (EQPT31)	2.95	12.17	2.36	9.74	4.53	18.72	14.51	59.93	.183	.76	.183	.76	.16	.65

¹ Nitrogen dioxide emissions include all oxides of nitrogen expressed as NO₂

6.0 Compliance Testing: That may apply.

Unit(s)	Compliance Test	Timeline
<p>Engine(s) or Turbine(s) > 180 hp</p> <p>Exemption: Existing units that have been tested within the last five (5) years are not required to perform an initial compliance test.</p>	<p>Initial Compliance Test</p> <p>Testing requirements shall be conducted in accordance with Section B111 of the GCP- O&G Permit.</p> <p>A test may be waived by the Department if the test is not required under a NMAC, NSPS, NESHAP or MACT.</p>	<p>Compliance tests shall be conducted within sixty (60) days after the unit(s) achieve the maximum normal production rate. If the maximum normal production rate does not occur within one hundred twenty (120) days of source startup, then the tests must be conducted no later than one hundred eighty (180) days after initial startup of the source.</p>
<p>Engine(s) or Turbine(s) > 180 hp</p> <p>Facilities with a PER less than 80 tpy of each regulated air pollutant shall perform periodic testing every three (3) years.</p>	<p>Periodic Testing</p> <p>Testing requirements shall be conducted in accordance with Section B111 of the GCP- O&G Permit.</p> <p>A test may be waived by the Department if the test is not required under a NMAC, NSPS, NESHAP or MACT.</p>	<p>Every three (3) years.</p>
<p>Engine(s) or Turbine(s) > 180 hp</p> <p>Facilities with PER greater than the 80 tpy of any regulated air pollutant shall perform periodic testing once per calendar year for each engine or turbine > 180 hp.</p>	<p>Periodic Testing</p> <p>Testing requirements shall be conducted in accordance with Section B111 of the GCP- O&G Permit</p>	<p>Every calendar year.</p>
<p>Flares</p>	<p>N/A unless subject to compliance test under a NMAC, NSPS, NESHAP or MACT.</p>	<p>Test dates according to applicable regulation</p>

Thermal Oxidizers	If the owner or operator does not provide manufacturer's data to establish the minimum operating temperature required to achieve 98% control efficiency, the owner/operator shall perform an initial compliance test to determine such operating temperature.	Within sixty (60) days of the start of operations, and the results shall be submitted to the Department within thirty (30) days of the test.
Storage Tanks	N/A unless subject to compliance test under a NMAC, NSPS, NESHAP or MACT.	Test dates according to applicable Regulation.

7.0 Startup and Shutdown:

Were emissions from startup, shutdown, and scheduled maintenance operations calculated and included in the emission tables? Yes
 No:

8.0 State and Federal Regulatory Analysis (NMAC/AQCR): Refer to Section 8 of the GCP O&G Registration Form.

9.0 Permit Writer Comments: