

**Federal Operating Permit Program  
Site Information Summary  
Form OP-1 (Page 3)  
Texas Commission on Environmental Quality**

<b>VII. Technical Contact Identifying Information</b> <i>(Complete if different from RO.)</i>
Technical Contact Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Technical Contact Full Name: Chris Marlais
Technical Contact Title: Sr. Environmental Specialist
Employer Name: Atmos Energy Corporation
Mailing Address: 5430 LBJ Fwy Ste 700
City: Dallas
State: Texas
ZIP Code: 75240
Territory:
Country: United States of America
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 469-841-9076
Fax No.:
Email: chris.marlais@atmosenergy.com
<b>VIII. Reference Only Requirements</b> <i>(For reference only.)</i>
<b>A.</b> State Senator:
<b>B.</b> State Representative:
<b>C.</b> Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</span>
<b>D.</b> Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>
<b>E.</b> Indicate the alternate language(s) in which public notice is required:

## Texas Commission on Environmental Quality

Title V Existing

3867

### Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	BETHEL STORAGE COMPRESSOR STATION
Does the site have a physical address?	No
Because there is no physical address, describe how to locate this site:	1.8 miles South of Bethel on FM 2706 2.1 mi South of Hwy 287
City	Bethel
State	TX
ZIP	75832
County	ANDERSON
Latitude (N) (##.#####)	31.890555
Longitude (W) (-###.#####)	95.914444
Primary SIC Code	4922
Secondary SIC Code	
Primary NAICS Code	486210
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN100542919
What is the name of the Regulated Entity (RE)?	BETHEL STORAGE COMPRESSOR STATION
Does the RE site have a physical address?	No
Because there is no physical address, describe how to locate this site:	1.8 miles South of Bethel on FM 2706, 2.1 miles South of Hwy 287
City	Athens
State	TX
ZIP	75751
County	ANDERSON
Latitude (N) (##.#####)	31.5319
Longitude (W) (-###.#####)	-95.5447
Facility NAICS Code	
What is the primary business of this entity?	NATURAL GAS COMPRESSION & TRANSMSSN.

### Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN602730319
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Atmos Energy Corporation
Texas SOS Filing Number	54895300
Federal Tax ID	751743247
State Franchise Tax ID	17517432476
State Sales Tax ID	

Local Tax ID	
DUNS Number	108203241
Number of Employees	501+
Independently Owned and Operated?	Yes

## Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	ATMOS ENERGY CORPORATION
Prefix	MR
First	MARLAN
Middle	
Last	JARZOMBEK
Suffix	
Credentials	
Title	VICE PRESIDENT OF OPERATIONS
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	5420 LBJ FWY
Routing (such as Mail Code, Dept., or Attn:)	STE 1500
City	DALLAS
State	TX
ZIP	75240
Phone (###-###-####)	2142062718
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	marlan.jarzombek@atmosenergy.com

## Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.	CHRIS MARLAIS(ATMOS ENERGY CO... )
Organization Name	ATMOS ENERGY CORPORATION
Prefix	MR
First	CHRIS
Middle	
Last	MARLAIS
Suffix	
Credentials	
Title	SR ENVIRONMENTAL SPECIALIST
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	5430 LBJ FWY

Routing (such as Mail Code, Dept., or Attn:)	STE 700
City	DALLAS
State	TX
ZIP	75240
Phone (###-###-####)	4698419076
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	chris.marlais@atmosenergy.com

## Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	31 Deg 53 Min 26 Sec
3) Permit Longitude Coordinate:	95 Deg 54 Min 52 Sec
4) Is this submittal a new application or an update to an existing application?	Update
4.1. Select the permit/project number for which this update should be applied.	3867-37523
5) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	No

## Title V Attachments Existing

Attach OP-1 (Site Information Summary)	
[File Properties]	
File Name	<a href=/ePermitsExternal/faces/file?fileId=271621>OP_1_20250728 Bethel Form OP-1 Section VII printed.pdf</a>
Hash	88DAD6995D716162273A0AF2F3FBE94CFFB2D306DC609D8F68378361794B0412
MIME-Type	application/pdf

Attach OP-2 (Application for Permit Revision/Renewal)

Attach OP-ACPS (Application Compliance Plan and Schedule)

Attach OP-REQ1 (Application Area-Wide Applicability Determinations and General Information)

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

If applicable, attach OP-AR1 (Acid Rain Permit Application)

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

An additional space to attach any other necessary information needed to complete the permit.

## Certification

I certify that I am the Responsible Official for this application and that, based on information and belief formed after reasonable inquiry, the statements and information on this form are true, accurate, and complete.

1. I am Marlan J Jarzombek, the owner of the STEERS account ER095731.
2. I have the authority to sign this data on behalf of the applicant named above.
3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
8. I am knowingly and intentionally signing Title V Existing 3867.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEC

OWNER OPERATOR Signature: Marlan J Jarzombek OWNER OPERATOR

Account Number:	ER095731
Signature IP Address:	97.105.226.2
Signature Date:	2025-07-28
Signature Hash:	0650934B27A7712C10D2CF4947217D66FCA3976759EEE60632F4FE8C4A23B992
Form Hash Code at time of Signature:	684DDF96569A891F83FB2BB12673554D58165A6233DD9CA3CF291B6FB7ACF700

## Submission

Reference Number:	The application reference number is 804114
Submitted by:	The application was submitted by ER095731/Marlan J Jarzombek
Submitted Timestamp:	The application was submitted on 2025-07-28 at 09:16:23 CDT
Submitted From:	The application was submitted from IP address 97.105.226.2
Confirmation Number:	The confirmation number is 667268
Steers Version:	The STEERS version is 6.92
Permit Number:	The permit number is 3867

## Additional Information

Application Creator: This account was created by Chris J Marlais

**From:** [John Walker](#)  
**To:** [Burdorf, Randy](#)  
**Cc:** [Engwall, Stephanie](#); [Marlais, Chris](#); [Rebecca Beatty](#)  
**Subject:** RE: Technical Review & Working Draft Permit -- FOP O3867/Project 37523, Atmos Energy Corporation/Bethel Storage Compressor Station  
**Date:** Sunday, July 27, 2025 2:15:00 PM

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Good Afternoon,

Please provide the requested information as soon as possible but no later than **08/01/2025:**

-

1. I provided the information to APIRT in regard to updating the Technical Contact to Chris Marlais. APIRT will not update the Technical Contact without an updated Form OP-1. Please provide an updated Form OP-1 Section VII. so that I may update the technical contact information.

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be submitted with the WDP response. After final review of the WDP, additional changes, supported by application updates, may require certification. I will advise you of these changes at a later date. Prior to transmittal of the Public Notice/Announcement Authorization Package, a duly signed OP-CRO1 form may be required which includes the specific dates or time-period of all submitted application documentation that were not previously certified. I will advise you of this requirement prior to sending the Public Notice/Announcement Authorization.

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1.

Please notify me when these updates have been submitted.

**As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at [R6AirPermitsTX@epa.gov](mailto:R6AirPermitsTX@epa.gov) and to the TCEQ regional office having jurisdiction. This submittal information can be found on our website at [Where to Submit FOP Applications and Permit-Related Documents](#).**

Thank you for your cooperation.

Sincerely,

**John Walker**  
Permit Reviewer  
OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)

Phone: (512) 239-1277



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at [www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)



**Permit By Rule Supplemental Table (Page 2)**  
**Table B: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for the Application Area**  
**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
03/27/2025	O3867	100542919

Unit ID No.	PBR No.	Version No./Date
DFP-1	106.511	09/04/2000
GEN-1A	106.511	09/04/2000
GEN-2A	106.511	09/04/2000
GEN-3A	106.511	09/04/2000
GEN-4	106.511	09/04/2000
MSS	106.359	09/10/2013
MSS COMBD	106.359	09/10/2013
PURGE	106.355	11/01/2001

**Permit By Rule Supplemental Table (Page 4)**  
**Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area**  
**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
03/27/2025	O3867	100542919

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
DFP-1	106.511	09/04/2000	Maintain documentation of annual operating hours as limited to not exceeding 10% of the normal operating schedule of the primary equipment.
GEN-1A	106.511	09/04/2000	Maintain documentation of annual operating hours as limited to not exceeding 10% of the normal operating schedule of the primary equipment.
GEN-2A	106.511	09/04/2000	Maintain documentation of annual operating hours as limited to not exceeding 10% of the normal operating schedule of the primary equipment.
GEN-3A	106.511	09/04/2000	Maintain documentation of annual operating hours as limited to not exceeding 10% of the normal operating schedule of the primary equipment.
GEN-4	106.511	09/04/2000	Maintain documentation of annual operating hours as limited to not exceeding 10% of the normal operating schedule of the primary equipment.
MSS	106.359	09/10/2013	Maintain records of all maintenance activities conducted under 30 TAC 106.359.
MSS COMPBD	106.359	09/10/2013	Maintain records of all maintenance activities conducted under 30 TAC 106.359.
PURGE	106.355	11/01/2001	Maintain records of pipeline quality natural gas blown down to atmosphere and/or flared during pipeline metering, purging, and maintenance events.

## Texas Commission on Environmental Quality

Title V Existing

3867

### Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	BETHEL STORAGE COMPRESSOR STATION
Does the site have a physical address?	No
Because there is no physical address, describe how to locate this site:	1.8 miles South of Bethel on FM 2706 2.1 mi South of Hwy 287
City	Bethel
State	TX
ZIP	75832
County	ANDERSON
Latitude (N) (##.#####)	31.890555
Longitude (W) (-###.#####)	95.914444
Primary SIC Code	4922
Secondary SIC Code	
Primary NAICS Code	221210
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN100542919
What is the name of the Regulated Entity (RE)?	BETHEL STORAGE COMPRESSOR STATION
Does the RE site have a physical address?	No
Because there is no physical address, describe how to locate this site:	1.8 miles South of Bethel on FM 2706, 2.1 miles South of Hwy 287
City	Athens
State	TX
ZIP	75751
County	ANDERSON
Latitude (N) (##.#####)	31.5319
Longitude (W) (-###.#####)	-95.5447
Facility NAICS Code	
What is the primary business of this entity?	NATURAL GAS COMPRESSION & TRANSMSSN.

### Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN602730319
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Atmos Energy Corporation
Texas SOS Filing Number	54895300
Federal Tax ID	751743247
State Franchise Tax ID	17517432476
State Sales Tax ID	

Local Tax ID	
DUNS Number	108203241
Number of Employees	501+
Independently Owned and Operated?	Yes

## Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	ATMOS ENERGY CORPORATION
Prefix	MR
First	MARLAN
Middle	
Last	JARZOMBEK
Suffix	
Credentials	
Title	VICE PRESIDENT OF OPERATIONS
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	5420 LBJ FWY
Routing (such as Mail Code, Dept., or Attn:)	STE 1500
City	DALLAS
State	TX
ZIP	75240
Phone (###-###-####)	2142062718
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	marlan.jarzombek@atmosenergy.com

## Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.	New Contact
Organization Name	Atmos Energy Corporation
Prefix	MR
First	Chris
Middle	
Last	Marlais
Suffix	
Credentials	
Title	Sr. Environmental Specialist
Enter new address or copy one from list:	Responsible Official Contact
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	5430 LBJ FWY STE 700

Routing (such as Mail Code, Dept., or Attn:)	
City	DALLAS
State	TX
ZIP	75240
Phone (###-###-####)	4698419076
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	chris.marlais@atmosenergy.com

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	31 Deg 53 Min 26 Sec
3) Permit Longitude Coordinate:	95 Deg 54 Min 52 Sec
4) Is this submittal a new application or an update to an existing application?	Update
4.1. Select the permit/project number for which this update should be applied.	3867-37523
5) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

Attach OP-2 (Application for Permit Revision/Renewal)

Attach OP-ACPS (Application Compliance Plan and Schedule)

Attach OP-REQ1 (Application Area-Wide Applicability Determinations and General Information)

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

[File Properties]

File Name	<a href=/ePermitsExternal/faces/file?fileId=248995>OP_PBRSUP_Atmos Bethel OP-PBRSUP_03272025.pdf</a>
Hash	6A30D8B78A256971676CF80EF82DA0EB2118D5034BC61259FFE0DCC28088A8B1
MIME-Type	application/pdf

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

If applicable, attach OP-AR1 (Acid Rain Permit Application)

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

An additional space to attach any other necessary information needed to complete the permit.

## Certification

I certify that I am the Responsible Official for this application and that, based on information and belief formed after reasonable inquiry, the statements and information on this form are true, accurate, and complete.

1. I am Marlan J Jarzombek, the owner of the STEERS account ER095731.
2. I have the authority to sign this data on behalf of the applicant named above.
3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
8. I am knowingly and intentionally signing Title V Existing 3867.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEC

OWNER OPERATOR Signature: Marlan J Jarzombek OWNER OPERATOR

Account Number:	ER095731
Signature IP Address:	97.105.226.2
Signature Date:	2025-04-01
Signature Hash:	0650934B27A7712C10D2CF4947217D66FCA3976759EEE60632F4FE8C4A23B992
Form Hash Code at time of Signature:	BDEAA067006DC7E495599F9184DD31A702A1A4AB4FAE7366B7248D729D103C55

## Submission

Reference Number:	The application reference number is 774981
Submitted by:	The application was submitted by ER095731/Marlan J Jarzombek
Submitted Timestamp:	The application was submitted on 2025-04-01 at 17:29:19 CDT
Submitted From:	The application was submitted from IP address 97.105.226.2
Confirmation Number:	The confirmation number is 643462
Steers Version:	The STEERS version is 6.89
Permit Number:	The permit number is 3867

## Additional Information

Application Creator: This account was created by Rebecca Beatty

**From:** Burdorf, Randy <Randy.Burdorf@atmosenergy.com>  
**Sent:** Tuesday, April 1, 2025 11:27 AM  
**To:** John Walker  
**Cc:** Engwall, Stephanie; Marlais, Chris; Rebecca Beatty  
**Subject:** RE: Technical Review & Working Draft Permit -- FOP 03867/Project 37523, Atmos Energy Corporation/Bethel Storage Compressor Station  
**Attachments:** Atmos Bethel OP-PBRSUP\_03272025.pdf; RE: Atmos Energy Technical Contact Update; [EXT] RE: Atmos Energy Technical Contact Update; RE: Atmos Energy Technical Contact Update; 20250320 - WDP\_FOP 03867\_Project 37523 Atmos Comments.docx  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Mr. Walker,

Attached find Atmos Energy Corporation's (Atmos Energy) comments below (in red) to your March 21, 2025 Technical Review and Working Draft Permit for the Bethel Storage Compressor Station Streamlined SOP Draft Permit.

Please contact me if you have any questions.

Thanks,

Randall (Randy) Burdorf | Manager Environmental | Atmos Energy Corporation | 972-855-3113 Office | 469-994-7678 Cell | 5430 Lyndon B Johnson Fwy, Ste. 700, Dallas, TX 75240 | [Randy.Burdorf@atmosenergy.com](mailto:Randy.Burdorf@atmosenergy.com) | [www.atmosenergy.com](http://www.atmosenergy.com)

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**From:** John Walker <[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)>  
**Sent:** Thursday, March 20, 2025 11:44 AM  
**To:** Marlais, Chris <[Chris.Marlais@atmosenergy.com](mailto:Chris.Marlais@atmosenergy.com)>  
**Subject:** [EXT] Technical Review & Working Draft Permit -- FOP 03867/Project 37523, Atmos Energy Corporation/Bethel Storage Compressor Station

**CAUTION: Don't be quick to click. This e-mail originated from outside of Atmos Energy. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Good Morning,

I have been assigned to the Federal Operating Permit (FOP) revision application of Permit No. 03867 for Atmos Energy Corporation, Bethel Storage Compressor Station. This application has been assigned Project No. 37523. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.



In addition, I wanted to let you know that EPA has, on occasion, objected to Title V permits based on the following:

- a. NSR permit and PBR monitoring sufficiency –please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient.
- b. Reference to confidential business information (CBI) in NSR permits and PBR submittals.
- c. High level terms in the SOP Applicable Requirement Summary Table. The high level terms are sometimes used in SOPs when unit attribute forms have not yet been updated due to regulatory amendments.
- d. Accuracy of PBR information provided on the supplemental table and in the permit – please refer to Forms OP-PBRSUP and OP-REQ1 Instructions.

If you have any questions or concerns on any of these items or think you need to do any additional updates, let me know and we can discuss further.

I have conducted a technical review of this application and I have attached an electronic copy of the Working Draft Permit (WDP) for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided.

**Please review the WDP and submit to me any comments you have regarding it by 04/03/2025.** Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP. Note that any application updates necessary to make requested changes must accompany the WDP comments. In addition, please provide the following requested information:

1. Please resubmit Form OP-PBRSUP in full (tables A-D). There are units in the WDP that are authorized by PBRs that are not documented on Form OP-PBRSUP such as Unit IDs DFP-1 and GEN-4.

Attached find the Form OP-PBRSUP (Tables B and D). Atmos plans to have the RO submit these update Form OP\_PBRSUP Tables B and D through Title V STEERS. Atmos will notify you via email after the RO has submitted these updated two Form OP-PBRSUP Tables B and D via STEERS.

Please note Permit Term 7 was updated to document when Form OP-PBRUP was submitted. This will be updated upon receiving the requested updated Form OP-PBRSUP. Atmos understands that Permit Term 7 will be updated.

2. I did not add Unit ID DEHY-2A to Form OP-REQ2. Permit Shields cannot be granted in a Minor Revision application. Permit shields can only be granted in a Renewal or Significant Revision application. Please resubmit this information in the next Renewal or Significant Revision application.

Atmos understands that the Permit Shield request for Unit ID DEHY-2A cannot be added to the SOP as part of this SOP Streamlined Permit Application.

3. Is Mr. Brian Caldronia still the technical contact? Does Form OP-1 (Page 3) Section VII. Technical Contact Identifying Information need to be submitted to update Technical Contact information?

Consistent with the attached 12/6/2024, 12/9/2024 and 12/11/2024 emails between Randy Burdorf (Atmos) and Daniel Gallegos (TCEQ, APIRT), Brian Caldronia (who has not worked at Atmos in over two years), has been updated by removing Brian Caldronia as the Technical Contact for the Bethel Facility's SOP. Consistent with the referenced three emails, Chris Marlais was added as the Technical Contact for this Facility and all other Atmos Facilities listed in the Table found in 12/9/2024 email from Daniel Gallegos. If you do not have access to the APIRT Database, Chris Marlais' Technical Contact Information is:

Chris Marlais  
Sr. Environmental Specialist  
Atmos Energy Corporation  
469-841-9076  
[chris.marlais@atmosenergy.com](mailto:chris.marlais@atmosenergy.com)

Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

Atmos is submitting our written responses to the TCEQ with this email. Please note that Atmos has requested a change to Page 1 of the Draft Permit that pertains to the Facility Identification NAISC Code

Please review the "SOP Technical Review Fact Sheet" located at [http://secure-web.cisco.com/1tOxBet0yzW2WpejBNImGO9ibkxHkDPdc-bgAzZXyS2l8D-orafqwlglfio1Q0rA6oA-iGnHdbgm-4VkpFDyFCjvjLMVdEoirD7Q8ttlFq5Alpg56V4hT8vzt4QMyxGSj0mhfHACPhRDBEffS53HsaSCxhtiq9thuWsGm3B7z7sxrr2EisPtGstHYx8naXg3mKjpqepp7WqfAPscmpawgQR2jNHsZencpV8WqceFsEbL3WcEV8FebmH1LrBgDbIx/http%3A%2F%2Fwww.tceq.texas.gov%2Fassets%2Fpublic%2Fpermitting%2Fair%2FGuidance%2FTitle\\_V%2Fsop\\_wdp\\_factsheet.pdf](http://secure-web.cisco.com/1tOxBet0yzW2WpejBNImGO9ibkxHkDPdc-bgAzZXyS2l8D-orafqwlglfio1Q0rA6oA-iGnHdbgm-4VkpFDyFCjvjLMVdEoirD7Q8ttlFq5Alpg56V4hT8vzt4QMyxGSj0mhfHACPhRDBEffS53HsaSCxhtiq9thuWsGm3B7z7sxrr2EisPtGstHYx8naXg3mKjpqepp7WqfAPscmpawgQR2jNHsZencpV8WqceFsEbL3WcEV8FebmH1LrBgDbIx/http%3A%2F%2Fwww.tceq.texas.gov%2Fassets%2Fpublic%2Fpermitting%2Fair%2FGuidance%2FTitle_V%2Fsop_wdp_factsheet.pdf). This guidance contains important information regarding the review process, application updates, WDP review and comment procedures.

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be submitted with the WDP response. After final review of the WDP, additional changes, supported by application updates, may require certification. I will advise you of these changes at a later date. Prior to transmittal of the Public Notice/Announcement Authorization Package, a duly signed OP-CRO1 form may be required which includes the specific dates or time-period of all submitted application documentation that were not previously certified. I will advise you of this requirement prior to sending the Public Notice/Announcement Authorization. **Atmos understands that the TCEQ Permit Writer will advise us of this requirement prior to sending the Permit to Public Notice/Announcement Authorization.**

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an

original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1.

Please notify me when these updates have been submitted.

**As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at [R6AirPermitsTX@epa.gov](mailto:R6AirPermitsTX@epa.gov) and to the TCEQ regional office having jurisdiction. This submittal information can be found on our website at [Where to Submit FOP Applications and Permit-Related Documents](#).**

Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

**John Walker**

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087

[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)

Phone: (512) 239-1277



How are we doing? Fill out our online customer satisfaction survey at [http://secure-web.cisco.com/1uHuWMl71dzOllS7gjFEEVeWtBS7cUBgCqgL1R8EhMKInWa-xcZKQt-\\_WRz-ORAJD7CqMzib6qlZjpj\\_3UxBUgHXYmD-zbbekxk4Mw1YHnMhkSCMuolmya38-a7viLIQdSGhzZExl42K0v9EKPhsrdS2LYLXYcAftaWPAYhED7Y3WHt\\_y8eZ1pKlu4TT-iRCDZLSuJptjGUPbPmDddmpYpYf6lMXVvyh0HWxqynglVw2RSDkb2/http%3A%2F%2Fwww.tceq.texas.gov%](http://secure-web.cisco.com/1uHuWMl71dzOllS7gjFEEVeWtBS7cUBgCqgL1R8EhMKInWa-xcZKQt-_WRz-ORAJD7CqMzib6qlZjpj_3UxBUgHXYmD-zbbekxk4Mw1YHnMhkSCMuolmya38-a7viLIQdSGhzZExl42K0v9EKPhsrdS2LYLXYcAftaWPAYhED7Y3WHt_y8eZ1pKlu4TT-iRCDZLSuJptjGUPbPmDddmpYpYf6lMXVvyh0HWxqynglVw2RSDkb2/http%3A%2F%2Fwww.tceq.texas.gov%2F)

**Permit By Rule Supplemental Table (Page 2)**  
**Table B: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for the Application Area**  
**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
03/27/2025	O3867	100542919

Unit ID No.	PBR No.	Version No./Date
DFP-1	106.511	09/04/2000
GEN-1A	106.511	09/04/2000
GEN-2A	106.511	09/04/2000
GEN-3A	106.511	09/04/2000
GEN-4	106.511	09/04/2000
MSS	106.359	09/10/2013
MSS COMBBD	106.359	09/10/2013
PURGE	106.355	11/01/2001

**Permit By Rule Supplemental Table (Page 4)**  
**Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area**  
**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
03/27/2025	O3867	100542919

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
DFP-1	106.511	09/04/2000	Maintain documentation of annual operating hours as limited to not exceeding 10% of the normal operating schedule of the primary equipment.
GEN-1A	106.511	09/04/2000	Maintain documentation of annual operating hours as limited to not exceeding 10% of the normal operating schedule of the primary equipment.
GEN-2A	106.511	09/04/2000	Maintain documentation of annual operating hours as limited to not exceeding 10% of the normal operating schedule of the primary equipment.
GEN-3A	106.511	09/04/2000	Maintain documentation of annual operating hours as limited to not exceeding 10% of the normal operating schedule of the primary equipment.
GEN-4	106.511	09/04/2000	Maintain documentation of annual operating hours as limited to not exceeding 10% of the normal operating schedule of the primary equipment.
MSS	106.359	09/10/2013	Maintain records of all maintenance activities conducted under 30 TAC 106.359.
MSS COMPBD	106.359	09/10/2013	Maintain records of all maintenance activities conducted under 30 TAC 106.359.
PURGE	106.355	11/01/2001	Maintain records of pipeline quality natural gas blown down to atmosphere and/or flared during pipeline metering, purging, and maintenance events.

# FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO  
Atmos Energy Corporation

AUTHORIZING THE OPERATION OF  
Bethel Storage Compressor Station  
Natural Gas [Distribution Transmission and Storage of Natural Gas \(NAICS 486210\)](#)

LOCATED AT  
Anderson County, Texas  
Latitude 31° 53' 26" Longitude 95° 54' 52"  
Regulated Entity Number: RN100542919

This permit is issued in accordance with and subject to the Texas Clean Air Act (TCAA), Chapter 382 of the Texas Health and Safety Code and Title 30 Texas Administrative Code Chapter 122 (30 TAC Chapter 122), Federal Operating Permits. Under 30 TAC Chapter 122, this permit constitutes the permit holder's authority to operate the site and emission units listed in this permit. Operations of the site and emission units listed in this permit are subject to all additional rules or amended rules and orders of the Commission pursuant to the TCAA.

This permit does not relieve the permit holder from the responsibility of obtaining New Source Review authorization for new, modified, or existing facilities in accordance with 30 TAC Chapter 116, Control of Air Pollution by Permits for New Construction or Modification.

The site and emission units authorized by this permit shall be operated in accordance with 30 TAC Chapter 122, the general terms and conditions, special terms and conditions, and attachments contained herein.

This permit shall expire five years from the date of issuance. The renewal requirements specified in 30 TAC § 122.241 must be satisfied in order to renew the authorization to operate the site and emission units.

Permit No: Q3867 Issuance Date: \_\_\_\_\_

\_\_\_\_\_  
For the Commission

- C. Title 40 CFR § 60.11 (relating to Compliance with Standards and Maintenance Requirements)
  - D. Title 40 CFR § 60.12 (relating to Circumvention)
  - E. Title 40 CFR § 60.13 (relating to Monitoring Requirements)
  - F. Title 40 CFR § 60.14 (relating to Modification)
  - G. Title 40 CFR § 60.15 (relating to Reconstruction)
  - H. Title 40 CFR § 60.19 (relating to General Notification and Reporting Requirements)
5. The permit holder shall comply with the requirements of 30 TAC Chapter 113, Subchapter C, § 113.100 for units subject to any subpart of 40 CFR Part 63, unless otherwise stated in the applicable subpart.
  6. The permit holder shall comply with certified registrations submitted to the TCEQ for purposes of establishing federally enforceable emission limits. A copy of the certified registration shall be maintained with the permit. Records sufficient to demonstrate compliance with the established limits shall be maintained. The certified registration and records demonstrating compliance shall be provided, on request, to representatives of the appropriate TCEQ regional office and any local air pollution control agency having jurisdiction over the site. The permit holder shall submit updated certified registrations when changes at the site require establishment of new emission limits. If changes result in emissions that do not remain below major source thresholds, the permit holder shall submit a revision application to codify the appropriate requirements in the permit.

#### **New Source Review Authorization Requirements**

7. Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area, including permits, permits by rule (including the terms, conditions, monitoring, recordkeeping, and reporting identified in registered PBRs and permits by rule identified in the PBR Supplemental Tables **dated December 20, 2024** in the application for project 37523), standard permits, flexible permits, special permits, permits for existing facilities including Voluntary Emissions Reduction Permits and Electric Generating Facility Permits issued under 30 TAC Chapter 116, Subchapter I, or special exemptions referenced in the New Source Review Authorization References attachment. These requirements:
  - A. Are incorporated by reference into this permit as applicable requirements
  - B. Shall be located with this operating permit
  - C. Are not eligible for a permit shield
8. The permit holder shall comply with the general requirements of 30 TAC Chapter 106, Subchapter A or the general requirements, if any, in effect at the time of the claim of any PBR.
9. The permit holder shall maintain records to demonstrate compliance with any emission limitation or standard that is specified in a permit by rule (PBR) or Standard Permit listed in the New Source Review Authorizations attachment. The records shall yield reliable data from the relevant time period that are representative of the emission unit's compliance with the PBR or Standard Permit. These records may include, but are not limited to, production capacity and throughput, hours of operation, safety data sheets (SDS), chemical composition of raw materials, speciation of air

Formatted: Highlight

**From:** Marlais, Chris <Chris.Marlais@atmosenergy.com>  
**Sent:** Thursday, March 20, 2025 1:18 PM  
**To:** John Walker  
**Cc:** Burdorf, Randy; Engwall, Stephanie  
**Subject:** RE: Technical Review & Working Draft Permit -- FOP 03867/Project 37523, Atmos Energy Corporation/Bethel Storage Compressor Station

Thank you, John. We'll let you know if we have any questions and address your requests by **4/3/2025**.

Chris Marlais  
Sr. Environmental Specialist  
Atmos Energy  
469-841-9076  
chris.marlais@atmosenergy.com

---

**From:** John Walker <John.Walker@tceq.texas.gov>  
**Sent:** Thursday, March 20, 2025 11:44 AM  
**To:** Marlais, Chris <Chris.Marlais@atmosenergy.com>  
**Subject:** [EXT] Technical Review & Working Draft Permit -- FOP 03867/Project 37523, Atmos Energy Corporation/Bethel Storage Compressor Station

**CAUTION: Don't be quick to click. This e-mail originated from outside of Atmos Energy. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Good Morning,

I have been assigned to the Federal Operating Permit (FOP) revision application of Permit No. 03867 for Atmos Energy Corporation, Bethel Storage Compressor Station. This application has been assigned Project No. 37523. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

In addition, I wanted to let you know that EPA has, on occasion, objected to Title V permits based on the following:

- a. NSR permit and PBR monitoring sufficiency –please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient.
- b. Reference to confidential business information (CBI) in NSR permits and PBR submittals.
- c. High level terms in the SOP Applicable Requirement Summary Table. The high level terms are sometimes used in SOPs when unit attribute forms have not yet been updated due to regulatory amendments.



- d. Accuracy of PBR information provided on the supplemental table and in the permit – please refer to Forms OP-PBRSUP and OP-REQ1 Instructions.

If you have any questions or concerns on any of these items or think you need to do any additional updates, let me know and we can discuss further.

I have conducted a technical review of this application and I have attached an electronic copy of the Working Draft Permit (WDP) for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided.

**Please review the WDP and submit to me any comments you have regarding it by 04/03/2025.** Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP. Note that any application updates necessary to make requested changes must accompany the WDP comments. In addition, please provide the following requested information:

1. Please resubmit Form OP-PBRSUP in full (tables A-D). There are units in the WDP that are authorized by PBRs that are not documented on Form OP-PBRSUP such as Unit IDs DFP-1 and GEN-4.

Please note Permit Term 7 was updated to document when Form OP-PBRUP was submitted. This will be updated upon receiving the requested updated Form OP-PBRSUP.

2. I did not add Unit ID DEHY-2A to Form OP-REQ2. Permit Shields cannot be granted in a Minor Revision application. Permit shields can only be granted in a Renewal or Significant Revision application. Please resubmit this information in the next Renewal or Significant Revision application.
3. Is Mr. Brian Caldronia still the technical contact? Does Form OP-1 (Page 3) Section VII. Technical Contact Identifying Information need to be submitted to update Technical Contact information?

Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

Please review the "SOP Technical Review Fact Sheet" located at [http://secure-web.cisco.com/1tOxBet0yzW2WpejBNImGO9ibkxHkDPdc-bgAzZXyS2l8D-orafqwlglfio1Q0rA6oA-iGnHdbgm-4VkpFDyFCjvjLMVdEoirD7Q8ttlFq5Alpg56V4hT8vzt4QMycxGSj0mhfHACPhRDBEffS53HsaSCxhtiq9thuWsGm3B7z7sxrr2EisPtGstHYx8naXg3mKjqpqpp7WqfAPscmpawgQR2jNHsZencpV8WqceFsEbL3WcEV8FebmH1LrBgDbIx/http%3A%2F%2Fwww.tceq.texas.gov%2Fassets%2Fpublic%2Fpermitting%2Fair%2FGuidance%2FTitle\\_V%2Fsop\\_wdp\\_factsheet.pdf](http://secure-web.cisco.com/1tOxBet0yzW2WpejBNImGO9ibkxHkDPdc-bgAzZXyS2l8D-orafqwlglfio1Q0rA6oA-iGnHdbgm-4VkpFDyFCjvjLMVdEoirD7Q8ttlFq5Alpg56V4hT8vzt4QMycxGSj0mhfHACPhRDBEffS53HsaSCxhtiq9thuWsGm3B7z7sxrr2EisPtGstHYx8naXg3mKjqpqpp7WqfAPscmpawgQR2jNHsZencpV8WqceFsEbL3WcEV8FebmH1LrBgDbIx/http%3A%2F%2Fwww.tceq.texas.gov%2Fassets%2Fpublic%2Fpermitting%2Fair%2FGuidance%2FTitle_V%2Fsop_wdp_factsheet.pdf). This guidance contains important information regarding the review process, application updates, WDP review and comment procedures.

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WDP response. After final review of the WDP, additional changes, supported by application updates, may require certification. I will advise you of these changes at a later date. Prior to transmittal of the Public Notice/Announcement Authorization Package, a duly signed OP-CRO1 form may be required which includes the specific dates or time-period of all submitted application documentation that were not previously certified. I will advise you of this requirement prior to sending the Public Notice/Announcement Authorization.

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1.

Please notify me when these updates have been submitted.

**As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at [R6AirPermitsTX@epa.gov](mailto:R6AirPermitsTX@epa.gov) and to the TCEQ regional office having jurisdiction. This submittal information can be found on our website at [Where to Submit FOP Applications and Permit-Related Documents](#).**

Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

**John Walker**

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087

[John.Walker@tceq.texas.gov](mailto:John.Walker@tceq.texas.gov)

Phone: (512) 239-1277



How are we doing? Fill out our online customer satisfaction survey at [http://secure-web.cisco.com/1uHuWM171dzOllS7gjFEEVeWtBS7cUBgCqgL1R8EhMKInWa-xcZKQt-\\_WRz-ORAJD7CagMZib6qlZjpj\\_3UxBUgHXYmD-zbbekxk4Mw1YHnMhkSCMuolmya38-a7viLIQdSGhzZExl42K0v9EKPhsrdS2LYLXYcAftaWPAyhED7Y3WHt\\_y8eZ1pKlu4TT-](http://secure-web.cisco.com/1uHuWM171dzOllS7gjFEEVeWtBS7cUBgCqgL1R8EhMKInWa-xcZKQt-_WRz-ORAJD7CagMZib6qlZjpj_3UxBUgHXYmD-zbbekxk4Mw1YHnMhkSCMuolmya38-a7viLIQdSGhzZExl42K0v9EKPhsrdS2LYLXYcAftaWPAyhED7Y3WHt_y8eZ1pKlu4TT-)

[iRCDZLSuJptjGUPbPmDddmpYpYf6lMXVvyh0HWxqynglVw2RSDkb2/http%3A%2F%2Fwww.tceq.texas.gov%2F](http://secure-web.cisco.com/1uHuWM171dzOllS7gjFEEVeWtBS7cUBgCqgL1R8EhMKInWa-xcZKQt-_WRz-ORAJD7CagMZib6qlZjpj_3UxBUgHXYmD-zbbekxk4Mw1YHnMhkSCMuolmya38-a7viLIQdSGhzZExl42K0v9EKPhsrdS2LYLXYcAftaWPAyhED7Y3WHt_y8eZ1pKlu4TT-iRCDZLSuJptjGUPbPmDddmpYpYf6lMXVvyh0HWxqynglVw2RSDkb2/http%3A%2F%2Fwww.tceq.texas.gov%2F)

Brooke Paup, *Chairwoman*  
Bobby Janecka, *Commissioner*  
Catarina R. Gonzales, *Commissioner*  
Kelly Keel, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

January 13, 2025

THE HONORABLE KEVIN SPARKS  
TEXAS SENATE  
PO BOX 12068  
AUSTIN TX 78711-2068

Re: Accepted Federal Operating Permit Initial Issuance Application  
Project Number: 36496  
Permit Number: O4630  
Enterprise Navitas Midstream Midland Basin LLC  
Leonidas Gas Plant  
Midland, Midland County  
Regulated Entity Number: RN111652863  
Customer Reference Number: CN604937243

Dear Senator Sparks:

This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) initial issuance application for a site located in your district. As part of this permitting process, the applicant is required to publish a formal newspaper public notice. The notice will inform the public of their right to make comments or request a public hearing. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. <https://gisweb.tceq.texas.gov/LocationMapper/?marker=-101.8025,31.855&level=13>.

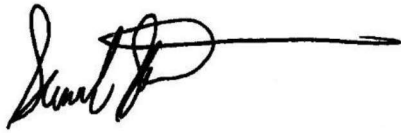
The FOP program regulates both new and existing major sources of emissions. The goal of the program is to improve air quality in Texas through increased compliance by codifying existing applicable regulatory requirements into the FOP. The FOP provides the applicant authorization to operate the equipment at the site. The FOP identifies and codifies air emission requirements (known as applicable requirements) that apply to the emission units at the site. The FOP does not authorize construction of emission units or emissions from those units. The New Source Review (NSR) permit is the mechanism for these authorizations.

The Honorable Kevin Sparks  
Page 2  
January 13, 2025

Re: Accepted Federal Operating Permit Initial Issuance Application

This letter is being sent to you for information only and no action is required. If you need further information, please contact me at (512) 239-1250.

Sincerely,

A handwritten signature in black ink, appearing to read 'Samuel Short', followed by a long horizontal line extending to the right.

Samuel Short, Deputy Director  
Air Permits Division  
Office of Air  
Texas Commission on Environmental Quality

Brooke Paup, *Chairwoman*  
Bobby Janecka, *Commissioner*  
Catarina R. Gonzales, *Commissioner*  
Kelly Keel, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

January 13, 2025

THE HONORABLE TOM CRADDICK  
TEXAS HOUSE OF REPRESENTATIVES  
PO BOX 2910  
AUSTIN TX 78768-2910

Re: Accepted Federal Operating Permit Initial Issuance Application  
Project Number: 36496  
Permit Number: O4630  
Enterprise Navitas Midstream Midland Basin LLC  
Leonidas Gas Plant  
Midland, Midland County  
Regulated Entity Number: RN111652863  
Customer Reference Number: CN604937243

Dear Representative Craddick:

This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) initial issuance application for a site located in your district. As part of this permitting process, the applicant is required to publish a formal newspaper public notice. The notice will inform the public of their right to make comments or request a public hearing. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application.

<https://gisweb.tceq.texas.gov/LocationMapper/?marker=-101.8025,31.855&level=13>.

The FOP program regulates both new and existing major sources of emissions. The goal of the program is to improve air quality in Texas through increased compliance by codifying existing applicable regulatory requirements into the FOP. The FOP provides the applicant authorization to operate the equipment at the site.

This letter is being sent to you for information only and no action is required. If you need further information, please contact me at (512) 239-1250.

Sincerely,

A handwritten signature in black ink, appearing to read "Samuel Short", followed by a long horizontal line.

Samuel Short, Deputy Director  
Air Permits Division  
Office of Air  
Texas Commission on Environmental Quality



December 20, 2024

Air Permits Initial Review Team (APIRT), MC 161  
Texas Commission on Environmental Quality  
12100 Park 35 Circle, Building C, Third Floor  
Austin, Texas 78753

**via STEERS**

**Subject: Title V SOP O3867 Minor (Streamline) Revision Application  
Atmos Energy Corporation (CN602730319)  
Bethel Storage Compressor Station (RN100542919)  
Bethel, Anderson County, Texas**

To Whom it May Concern:

Atmos Energy Corporation (Atmos) is submitting the enclosed Title V Site Operating Permit (SOP) Minor (Streamline) Revision application to the Texas Commission on Environmental Quality (TCEQ) for Atmos's Bethel Storage Compressor Station (Station) near Bethel, Texas in Anderson County.

With this SOP Streamline Revision application, Atmos is removing three (3) emergency generators (Unit IDs GEN-2, GEN-3, and GEN-5) and adding three (3) emergency generators (Unit IDs GEN-1A, GEN-2A, and GEN-3A), replacing one (1) dehydration unit (Unit ID DEHY-2) with one (1) new unit (Unit ID DEHY-2A), removing three (3) storage tanks (Unit IDs TANK-06, TANK-13, and WASHTANK) and adding twelve (12) storage tanks (Unit IDs TANK-02, TANK-03, TANK-05, TANK-11, TANK-12, TANK-13A, TANK-15, TANK-16, TANK-17, TANK-18, TANK-19, and TANK-20).

Atmos appreciates in advance the TCEQ's review and approval of this SOP Streamline Revision application. If you have any questions regarding the information presented in this letter and attachments, please do not hesitate to contact me at (469) 841-9076 or via email at [chris.marlais@atmosenergy.com](mailto:chris.marlais@atmosenergy.com).

Sincerely,

A handwritten signature in black ink that reads "Chris Marlais". The signature is fluid and cursive, with the first name "Chris" and last name "Marlais" clearly distinguishable.

Chris Marlais  
Sr. Environmental Specialist

cc: Ms. Michelle Baetz, TCEQ Region 5 - Tyler  
Ms. Patricia Hustava, Apex TITAN, Inc.  
EPA Region 6 (via email) at [R6AirPermitsTX@epa.gov](mailto:R6AirPermitsTX@epa.gov)

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**BETHEL STORAGE COMPRESSOR STATION**

**ATMOS ENERGY CORPORATION**

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**ATTACHMENT 1  
ADMINISTRATIVE FORMS**

**TITLE V SOP MINOR REVISION APPLICATION**

**BETHEL STORAGE COMPRESSOR STATION**

**ATMOS ENERGY CORPORATION**

The following Administrative Forms are included in this section:

- OP-2 Application for Permit Revision/Renewal
- OP-SUMR Individual Unit Summary for Revisions
- OP-CRO1 Certification by Responsible Official
- OP-PBRSUP Permit By Rule Supplemental Table



**Federal Operating Permit Program  
Application for Permit Revision/Renewal  
Form OP-2-Table 1  
Texas Commission on Environmental Quality**

Date: 12/20/2024	
Permit No.: O3867	
Regulated Entity No.: 100542919	
Company Name: Atmos Energy Corporation	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>	
<b>I. Application Type</b>	
Indicate the type of application:	
<input type="checkbox"/> Renewal	
<input checked="" type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
<input type="checkbox"/> Significant Revision	
<input type="checkbox"/> Revision Requesting Prior Approval	
<input type="checkbox"/> Administrative Revision	
<input type="checkbox"/> Response to Reopening	
<b>II. Qualification Statement</b>	
For SOP Revisions Only <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>	
For GOP Revisions Only <span style="float: right;"><input type="checkbox"/> YES <input type="checkbox"/> NO</span>	

**Federal Operating Permit Program  
Application for Permit Revision/Renewal  
Form OP-2-Table 1 (continued)  
Texas Commission on Environmental Quality**

**III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)**

Indicate all pollutants for which the site is a major source based on the site's potential to emit:  
(Check the appropriate box[es].)

☐ VOC      ☒ NO<sub>x</sub>      ☐ SO<sub>2</sub>      ☐ PM<sub>10</sub>      ☐ CO      ☐ Pb      ☐ HAP

Other:

**IV. Reference Only Requirements (For reference only)**

Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)?      ☒ YES    ☐ NO    ☐ N/A

**V. Delinquent Fees and Penalties**

Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.

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**Federal Operating Permit Program  
Application for Permit Revision/Renewal  
Form OP-2-Table 2  
Texas Commission on Environmental Quality**

Date: 12/20/2024
Permit No.: O3867
Regulated Entity No.: 100542919
Company Name: Atmos Energy Corporation

Using the table below, provide a description of the revision.

Revision No.	Revision Code		Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
1	MS-C	No	DEHY-2	OP-REQ2	77036	Remove unit from permit
2	MS-C	Yes	DEHY-2A	OP-REQ2	77036	Add unit to permit
3	MS-C	No	GEN-2	OP-UA2	106.511/09/04/20 00	Remove unit from permit
4	MS-C	No	GEN-3	OP-UA2	106.511/09/04/20 00	Remove unit from permit
5	MS-C	No	GEN-5	OP-UA2	106.511/09/04/20 00	Remove unit from permit
6	MS-C	Yes	GEN-1A	OP-UA2	106.511/09/04/20 00	Add unit to permit
7	MS-C	Yes	GEN-2A	OP-UA2	106.511/09/04/20 00	Add unit to permit

**Federal Operating Permit Program  
Application for Permit Revision/Renewal  
Form OP-2-Table 2  
Texas Commission on Environmental Quality**

Date:12/20/2024
Permit No.: O3867
Regulated Entity No.: 100542919
Company Name: Atmos Energy Corporation

Using the table below, provide a description of the revision.

Revision No.	Revision Code		Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
8	MS-C	Yes	GEN-3A	OP-UA2	106.511/09/04/2000	Add unit to permit
9	MS-C	Yes	TANK-02	OP-UA3	77036	Add unit to permit
10	MS-C	Yes	TANK-03	OP-UA3	77036	Add unit to permit
11	MS-C	Yes	TANK-05	OP-UA3	77036	Add unit to permit
12	MS-C	No	TANK-06	OP-UA3	77036	Remove unit from permit
13	MS-C	Yes	TANK-11	OP-UA3	77036	Add unit to permit
14	MS-C	Yes	TANK-12	OP-UA3	77036	Add unit to permit
15	MS-C	No	TANK-13	OP-UA3	77036	Remove unit from permit
16	MS-C	Yes	TANK-13A	OP-UA3	77036	Add unit to permit
17	MS-C	Yes	TANK-15	OP-UA3	77036	Add unit to permit

**Federal Operating Permit Program  
Application for Permit Revision/Renewal  
Form OP-2-Table 2  
Texas Commission on Environmental Quality**

Date: 12/20/2024
Permit No.: O3867
Regulated Entity No.: 100542919
Company Name: Atmos Energy Corporation

Using the table below, provide a description of the revision.

Revision No.	Revision Code		Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
18	MS-C	Yes	TANK-16	OP-UA3	77036	Add unit to permit
19	MS-C	Yes	TANK-17	OP-UA3	77036	Add unit to permit
20	MS-C	Yes	TANK-18	OP-UA3	77036	Add unit to permit
21	MS-C	Yes	TANK-19	OP-UA3	77036	Add unit to permit
22	MS-C	Yes	TANK-20	OP-UA3	77036	Add unit to permit
23	MS-C	No	WASHTANK	OP-UA3	77036	Remove unit from permit
24	MS-C	Yes	MSS COMBPD	OP-PBRSUP	106.359/09/10/2013	Address on Form OP-PBRSUP
25	MS-C	Yes	PURGE	OP-PBRSUP	106.355/11/01/2001	Address on Form OP-PBRSUP

**Texas Commission on Environmental Quality  
Federal Operating Permit Program  
Individual Unit Summary for Revisions  
Form OP-SUMR**

[Table 1](#)

Date	Permit No.	Regulated Entity No.
12/20/2024	O3867	100542919

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
D	1	DEHY-2	OP-REQ2	Glycol Dehydration Unit 2		77036	
A	2	DEHY-2A	OP-REQ2	Glycol Dehydration Unit 2A		77036	
D	3	GEN-2	OP-UA2	Emergency Generator		106.511/09/04/2000	
D	4	GEN-3	OP-UA2	Emergency Engine		106.511/09/04/2000	
D	5	GEN-5	OP-UA2	Emergency Engine		106.511/09/04/2000	
A	6	GEN-1A	OP-UA2	Emergency Generator Engine 1A		106.511/09/04/2000	
A	7	GEN-2A	OP-UA2	Emergency Generator Engine 2A		106.511/09/04/2000	
A	8	GEN-3A	OP-UA2	Firewater Generator Engine 3A		106.511/09/04/2000	
A	9	TANK-02	OP-UA3	Cylinder Oil Tank		77036	
A	10	TANK-03	OP-UA3	Lube Oil Tank		77036	

**Texas Commission on Environmental Quality  
Federal Operating Permit Program  
Individual Unit Summary for Revisions  
Form OP-SUMR**

[Table 1](#)

Date	Permit No.	Regulated Entity No.
12/20/2024	O3867	100542919

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
A	11	TANK-05	OP-UA3	Lube Oil Tank		77036	
D	12	TANK-06	OP-UA3	Lube Oil Tank		77036	
A	13	TANK-11	OP-UA3	Slop Oil Tank		77036	
A	14	TANK-12	OP-UA3	Firewater Pump Diesel Fuel Tank		77036	
D	15	TANK-13	OP-UA3	Engine Oil Tank		77036	
A	16	TANK-13A	OP-UA3	Diesel Fuel Tank		77036	
A	17	TANK-15	OP-UA3	Hydraulic Oil Tank		77036	
A	18	TANK-16	OP-UA3	Hydraulic Oil Tank		77036	
A	19	TANK-17	OP-UA3	Coolant Storage Tank		77036	
A	20	TANK-18	OP-UA3	Coolant Storage Tank		77036	

**Texas Commission on Environmental Quality  
Federal Operating Permit Program  
Individual Unit Summary for Revisions  
Form OP-SUMR**

**Table 1**

Date	Permit No.	Regulated Entity No.
12/20/2024	O3867	100542919

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
A	21	TANK-19	OP-UA3	Winters Diesel Fuel Tank		77036	
A	22	TANK-20	OP-UA3	Winters Mineral Spirits Storage Tank		77036	
D	23	WASHTANK	OP-UA3	Oily Water Tank		77036	

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**Form OP-CRO1**  
**Certification by Responsible Official**  
**Federal Operating Permit Program**  
**Texas Commission on Environmental Quality**

All initial issuance, revision, renewal, and reopening permit application submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

<b>I. Identifying Information</b>
RN: 100542919
CN: 602730319
Account No.: AA00640
Permit No.: O3867
Project No.: TBA
Area Name: Bethel Storage Compressor Station
Company Name: Atmos Energy Corporation
<b>II. Certification Type</b> <i>(Please mark appropriate box)</i>
<input checked="" type="checkbox"/> Responsible Official Representative <input type="checkbox"/> Duly Authorized Representative
<b>III. Submittal Type</b> <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>
<input type="checkbox"/> SOP/TOP Initial Permit Application <input checked="" type="checkbox"/> Permit Revision, Renewal, or Reopening
<input type="checkbox"/> GOP Initial Permit Application <input type="checkbox"/> Update to Permit Application
<input type="checkbox"/> Other:

**Form OP-CRO1**  
**Certification by Responsible Official**  
**Federal Operating Permit Program**  
**Texas Commission on Environmental Quality**

**IV. Certification of Truth**

**This certification does not extend to information which is designated by TCEQ as information for reference only.**

I, Marlan Jarzombek certify that I am the Responsible Official (RO)  
*(Certifier Name printed or typed)* *(RO or DAR)*

and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:

*Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).*

Time Period: From \_\_\_\_\_ to \_\_\_\_\_  
*(Start Date)* *(End Date)*

Specific Dates: 12/20/2024 \_\_\_\_\_  
*(Date 1)* *(Date 2)* *(Date 3)* *(Date 4)*

\_\_\_\_\_  
*(Date 5)* *(Date 6)*

Signature: Submitted via STEERS Signature Date: 12/20/24

Title: Vice President of Operations

**Permit By Rule Supplemental Table (Page 2)**  
**Table B: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for the Application Area**  
**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
12/20/2024	O3867	100542919

Unit ID No.	PBR No.	Version No./Date
GEN-1A	106.511	09/04/2000
GEN-2A	106.511	09/04/2000
GEN-3A	106.511	09/04/2000
MSS COMPBD	106.359	09/10/2013
PURGE	106.355	11/01/2001

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**Permit By Rule Supplemental Table (Page 4)**  
**Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area**  
**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
12/20/2024	O3867	100542919

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
GEN-1A	106.511	09/04/2000	Maintain documentation of annual operating hours as limited to not exceeding 10% of the normal operating schedule of the primary equipment.
GEN-2A	106.511	09/04/2000	Maintain documentation of annual operating hours as limited to not exceeding 10% of the normal operating schedule of the primary equipment.
GEN-3A	106.511	09/04/2000	Maintain documentation of annual operating hours as limited to not exceeding 10% of the normal operating schedule of the primary equipment.
MSS COMPBD	106.359	09/10/2013	Maintain records of all maintenance activities conducted under 30 TAC 106.359.
PURGE	106.355	11/01/2001	Maintain records of pipeline quality natural gas blown down to atmosphere and/or flared during pipeline metering, purging, and maintenance events.

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**ATTACHMENT 2  
UNIT ATTRIBUTE FORMS**

**TITLE V SOP MINOR REVISION APPLICATION**

**BETHEL STORAGE COMPRESSOR STATION**

**ATMOS ENERGY CORPORATION**

The following Unit Attribute Forms are included in this section:

- OP-UA2 – Stationary Reciprocating Internal Combustion Engine Attributes
- OP-UA3 – Storage Tank/Vessel Attributes

**Stationary Reciprocating Internal Combustion Engine Attributes  
Form OP-UA2 (Page 4)**

**Federal Operating Permit Program**

**Table 2a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)**

**Subpart ZZZZ: National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines  
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
12/20/24	O3867	100542919

Unit ID No.	SOP/GOP Index No.	HAP Source	Brake HP	Construction/ Reconstruction Date	Nonindustrial Emergency Engine	Service Type	Stationary RICE Type
GEN-1A	63ZZZZ-2	AREA	500+	06+			
GEN-2A	63ZZZZ-2	AREA	500+	06+			
GEN-3A	63ZZZZ-2	AREA	100-	06+			

2-1

**Stationary Reciprocating Internal Combustion Engine Attributes  
Form OP-UA2 (Page 7)**

**Federal Operating Permit Program**

**Table 3: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117) Subchapter E: Multi-Region Combustion Control  
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
12/20/24	O3867	100542919

Unit ID No.	SOP/GOP Index No.	Unit Type	Horsepower Rating	Landfill	Control Operations	NO <sub>x</sub> and O <sub>2</sub> Monitoring	Ammonia Use	NHR <sub>3</sub> Emission Limitation	Ammonia Monitoring
GEN-1A	R73310	EMERG							
GEN-2A	R73310	EMERG							
GEN-3A	R73310-1	DIESEL							

**Stationary Reciprocating Internal Combustion Engine Attributes**  
**Form OP-UA2 (Page 8)**  
**Federal Operating Permit Program**  
**Table 4a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**  
**Subchapter JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
12/20/24	O3867	100542919

Unit ID No.	SOP/GOP Index No.	Construction/ Reconstruction/ Modification Date	Test Cell	Exemption	Temp Replacement	Horsepower	Fuel	AEL No.	Lean Burn	Commencing
GEN-1A	60JJJJ-2	YES	NO	NONE	NO	500+E	NATGAS			CON
GEN-2A	60JJJJ-2	YES	NO	NONE	NO	500+E	NATGAS			CON

2-3



**Stationary Reciprocating Internal Combustion Engine Attributes**  
**Form OP-UA2 (Page 9)**  
**Federal Operating Permit Program**  
**Table 4b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**  
**Subchapter JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
12/20/24	O3867	100542919

Unit ID No.	SOP/GOP Index No.	Manufacture Date	Displacement	Certified	Operation	Certified Modification	Service	Severe Duty	Optional Compliance
GEN-1A	60JJJJ-2	N0710+E		YES	YES		EMERG		
GEN-2A	60JJJJ-2	N0710+E		YES	YES		EMERG		

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**Stationary Reciprocating Internal Combustion Engine Attributes**  
**Form OP-UA2 (Page 10)**  
**Federal Operating Permit Program**  
**Table 5a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**  
**Subpart IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
12/20/24	O3867	100542919

Unit ID No.	SOP/GOP Index No.	Applicability Date	Exemptions	Service	Commencing	Manufacture Date
GEN-3A	60IIII-2	2005+	NONE	EMERG	CON	0406+

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**Stationary Reciprocating Internal Combustion Engine Attributes  
Form OP-UA2 (Page 11)**

**Federal Operating Permit Program**

**Table 5b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**

**Subpart IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines  
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
12/20/24	O3867	100542919

Unit ID No.	SOP/GOP Index No.	Diesel	AES No.	Displacement	Generator Set	Model Year	Install Date
GEN-3A	60IIII-2	DIESEL		10-CS		2009	

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**Stationary Reciprocating Internal Combustion Engine Attributes**  
**Form OP-UA2 (Page 12)**  
**Federal Operating Permit Program**  
**Table 5c: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**  
**Subpart IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
12/20/24	O3867	100542919

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Unit ID No.	SOP/GOP Index No.	Kilowatts	Filter	AECD	Standard	Compliance Option	PM Compliance	Options
GEN-3A	60IIII-2	E37-75		NO	YES	MANU YES		

**Storage Tank/Vessel Attributes**  
**Form OP-UA3 (Page 3)**  
**Federal Operating Permit Program**  
**Table 3: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**  
**Subpart Kb: Standards of Performance for Volatile Organic Liquid Storage Vessels**  
**(Including Petroleum Liquid Storage Vessels)**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
12/20/2024	3867	100542919

Unit ID No.	SOP/GOP Index No.	Product Stored	Storage Capacity	WW Tank Control	Maximum TVP	Storage Vessel Description	AMEL ID No.	Guidepole	Reid Vapor Pressure	Control Device ID No.
TANK-02	60Kb-1	VOL	10K-							
TANK-03	60Kb-1	VOL	10K-							
TANK-05	60Kb-1	VOL	10K-							
TANK-11	60Kb-2	VOL	10K-20K							
TANK-12	60Kb-1	VOL	10K-							
TANK-13A	60Kb-1	VOL	10K-							
TANK-15	60Kb-1	VOL	10K-							
TANK-16	60Kb-1	VOL	10K-							
TANK-17	60Kb-1	VOL	10K-							
TANK-18	60Kb-1	VOL	10K-							

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**Storage Tank/Vessel Attributes**  
**Form OP-UA3 (Page 3)**  
**Federal Operating Permit Program**  
**Table 3: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**  
**Subpart Kb: Standards of Performance for Volatile Organic Liquid Storage Vessels**  
**(Including Petroleum Liquid Storage Vessels)**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
12/20/2024	3867	100542919

Unit ID No.	SOP/GOP Index No.	Product Stored	Storage Capacity	WW Tank Control	Maximum TVP	Storage Vessel Description	AMEL ID No.	Guidepole	Reid Vapor Pressure	Control Device ID No.
TANK-19	60Kb-1	VOL	10K-							
TANK-20	60Kb-1	VOL	10K-							

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**ATTACHMENT 3**  
**APPLICABILITY DETERMINATION**

**TITLE V SOP MINOR REVISION APPLICATION**

**BETHEL STORAGE COMPRESSOR STATION**

**ATMOS ENERGY CORPORATION**

The following Applicability Forms are included in this section:

- OP-REQ1 – Application Area-Wide Applicability Determinations and General Information
- OP-REQ2 – Negative Applicable/Superseded Requirement Determinations

**Application Area-Wide Applicability Determinations and General Information**  
**Form OP-REQ1 (Page 89)**  
**Federal Operating Permit Program**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
12/20/2024	O3867	100542919

For SOP applications, answer ALL questions unless otherwise directed.

- ◆ For GOP applications, answer ONLY these questions unless otherwise directed.

**XII. NSR Authorizations (continued) - (Attach additional sheets if necessary for sections XII.E-J.)**

- ◆ **H. Title 30 TAC Chapter 116 Permits, Special Permits, Standard Permits, Other Authorizations (Other Than Permits By Rule, PSD Permits, NA Permits) for the Application Area**

Authorization No.	Issuance Date	Authorization No.	Issuance Date	Authorization No.	Issuance Date
77036	06/18/2024				

- ◆ **I. Permits by Rule (30 TAC Chapter 106) for the Application Area**

*A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.*

PBR No.	Version No./Date	PBR No.	Version No./Date	PBR No.	Version No./Date
106.355	11/01/2001				
106.359	09/10/2013				
106.511	09/04/2000				

- ◆ **J. Municipal Solid Waste and Industrial Hazardous Waste Permits with an Air Addendum**

Permit No.	Issuance Date	Permit No.	Issuance Date	Permit No.	Issuance Date



**Form OP-REQ2**  
**Negative Applicable/Superseded Requirement Determinations**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
12/20/2024	O3867	100542919

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
	2	DEHY-2A	OP-REQ2	MACT HH	§63.760(a)	The site is not an oil and natural gas production facility.
	2	DEHY-2A	OP-REQ2	MACT HHH	§63.1270(a)	The site is not a major source of HAP emissions.

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## Texas Commission on Environmental Quality

Title V Existing

3867

### Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	BETHEL STORAGE COMPRESSOR STATION
Does the site have a physical address?	No
Because there is no physical address, describe how to locate this site:	1.8 miles South of Bethel on FM 2706, 2.1 miles South of Hwy 287
City	Bethel
State	TX
ZIP	75832
County	ANDERSON
Latitude (N) (##.#####)	31.890555
Longitude (W) (-###.#####)	95.914444
Primary SIC Code	4922
Secondary SIC Code	
Primary NAICS Code	221210
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN100542919
What is the name of the Regulated Entity (RE)?	BETHEL STORAGE COMPRESSOR STATION
Does the RE site have a physical address?	No
Because there is no physical address, describe how to locate this site:	1.8 miles South of Bethel on FM 2706, 2.1 miles South of Hwy 287
City	Athens
State	TX
ZIP	75751
County	ANDERSON
Latitude (N) (##.#####)	31.5319
Longitude (W) (-###.#####)	-95.5447
Facility NAICS Code	
What is the primary business of this entity?	NATURAL GAS COMPRESSION & TRANSMSSN.

### Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN602730319
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Atmos Energy Corporation
Texas SOS Filing Number	54895300
Federal Tax ID	751743247
State Franchise Tax ID	17517432476
State Sales Tax ID	

Local Tax ID	
DUNS Number	108203241
Number of Employees	501+
Independently Owned and Operated?	Yes

## Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	ATMOS ENERGY CORPORATION
Prefix	MR
First	MARLAN
Middle	
Last	JARZOMBEK
Suffix	
Credentials	
Title	VP STORAGE AND COMPRESSION OPERATIONS

Enter new address or copy one from list:

Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	5420 LBJ FWY STE 1818
Routing (such as Mail Code, Dept., or Attn:)	
City	DALLAS
State	TX
ZIP	75240
Phone (###-###-####)	2142062718
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	2142062132
E-mail	marlan.jarzombek@atmosenergy.com

## Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.	New Contact
Organization Name	Atmos Energy Corporation
Prefix	MR
First	Chris
Middle	
Last	Marlais
Suffix	
Credentials	
Title	Sr. Environmental Specialist
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic

Mailing Address (include Suite or Bldg. here, if applicable)	5430 LBJ FWY STE 700
Routing (such as Mail Code, Dept., or Attn:)	
City	DALLAS
State	TX
ZIP	75240
Phone (###-###-####)	4698419076
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	chris.marlais@atmosenergy.com

## Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	31 Deg 53 Min 26 Sec
3) Permit Longitude Coordinate:	95 Deg 54 Min 52 Sec
4) Is this submittal a new application or an update to an existing application?	New Application
4.1. What type of permitting action are you applying for?	Streamlined Revision
4.1.1. Are there any permits that should be voided upon issuance of this permit application through permit conversion?	No
4.1.2. Are there any permits that should be voided upon issuance of this permit application through permit consolidation?	No
5) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	No

## Title V Attachments Existing

Attach OP-1 (Site Information Summary)

Attach OP-2 (Application for Permit Revision/Renewal)

[File Properties]

File Name	<a href=/ePermitsExternal/faces/file?fileId=230748>OP_2_Attachment OP-2.pdf</a>
Hash	33F9700EC33387503BD75800E3DAAF640F4947A6C4B3CBBC2618CC64961076C6
MIME-Type	application/pdf

Attach OP-REQ1 (Application Area-Wide Applicability Determinations and General Information)

[File Properties]

File Name	<a href=/ePermitsExternal/faces/file?fileId=230736>OP_REQ1_Attachment OP-REQ1.pdf</a>
Hash	C5B139008C730AA58B04100A6B962426B1C868722B3CFBCD892F3D0CD9EC3812
MIME-Type	application/pdf

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

[File Properties]

File Name	<a href=/ePermitsExternal/faces/file?fileId=230737>OP_REQ2_Attachment OP-
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REQ2.pdf</a>

Hash 67DDCFEEEE2D6EEC48DA1559A73FFA00696EB3B8AC2D382609713A53F39E01630

MIME-Type application/pdf

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=230739>OP\_PBRSUP\_Attachment PBR Supplemental Table.pdf</a>

Hash 5D2D4B0BD08242E9D67DA66D469AA9D8C94D765C1A6E60577499B188922F6383

MIME-Type application/pdf

Attach OP-SUMR (Individual Unit Summary for Revisions)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=230740>OP\_SUMR\_Attachment OP-SUMR.pdf</a>

Hash 359AAA26358FD8679BC0E5E0238C8F45F80812F645CAD2CD29A63414BB7DA2A2

MIME-Type application/pdf

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=230745>Attachment OP-UA2.pdf</a>

Hash B2ACD4C07E6AFAFC70FB191D76966347FC9144022CFAE0EED148D0C2F465FE40

MIME-Type application/pdf

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=230746>Attachment OP-UA3.pdf</a>

Hash 382ECE8C1B2A5AB715B906344A3C3027BC4CCDE5C99F1D13D68DEC2A14D931BF

MIME-Type application/pdf

If applicable, attach OP-AR1 (Acid Rain Permit Application)

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=230747>1\_Bethel SOP Rev\_20241218.pdf</a>

Hash CB490BB0CCCCB18562F8EA7C4C138B283B63A63ECDCCDD0542DC2022197406013

MIME-Type application/pdf

An additional space to attach any other necessary information needed to complete the permit.

# Expedite Title V

1) Per Texas Health and Safety Code, Section 382.05155, does the applicant want to expedite the processing of this application?	No
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## Certification

I certify that I am the Responsible Official for this application and that, based on information and belief formed after reasonable inquiry, the statements and information on this form are true, accurate, and complete.

1. I am Marlan J Jarzombek, the owner of the STEERS account ER095731.

2. I have the authority to sign this data on behalf of the applicant named above.

3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.

4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.

5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.

6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.

7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.

8. I am knowingly and intentionally signing Title V Existing 3867.

9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEC

OWNER OPERATOR Signature: Marlan J Jarzombek OWNER OPERATOR

Account Number:	ER095731
Signature IP Address:	97.105.226.2
Signature Date:	2024-12-20
Signature Hash:	0650934B27A7712C10D2CF4947217D66FCA3976759EEE60632F4FE8C4A23B992
Form Hash Code at time of Signature:	8173D5F37FE14DF9292973F5D17E07B884E779FEC2C0C3A6ED659837455305E9

## Submission

Reference Number:	The application reference number is 731744
Submitted by:	The application was submitted by ER095731/Marlan J Jarzombek
Submitted Timestamp:	The application was submitted on 2024-12-20 at 10:02:03 CST
Submitted From:	The application was submitted from IP address 97.105.226.2
Confirmation Number:	The confirmation number is 604067
Steers Version:	The STEERS version is 6.84
Permit Number:	The permit number is 3867

## Additional Information

Application Creator: This account was created by Chris J Marlais
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