

March 31, 2023

Kale Hanner
ONEOK Rockies Midstream, LLC
Western Compressor Station
100 W. Fifth St.
Tulsa, OK 74103

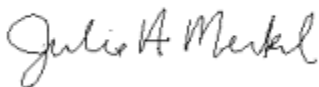
Sent via email: kale.hanner@oneok.com

RE: Final Permit Issuance for MAQP #5274-01

Dear Mr. Hanner:

Montana Air Quality Permit (MAQP) #5274-01 is deemed final as of March 31, 2023, by DEQ. This permit is for a Natural Gas Compressor Station located at the Southwest Quarter of the Southwest Quarter of Section 24, Township 25N, Range 58E in Richland County at 47.8993 degrees latitude and -104.18 degrees longitude. The street address is County Road 350, Fairview, MT 59221 in Richland County. All conditions of the Decision remain the same. Enclosed is a copy of your permit with the final date indicated.

For DEQ,



Julie A. Merkel
Permitting Services Section Supervisor
Air Quality Bureau
(406) 444-3626



Troy Burrows
Air Quality Scientist
Air Quality Bureau
(406) 444-1452

PLAINTIFFS'
EXHIBIT

P150

Montana Department of Environmental Quality
Air, Energy & Mining Division
Air Quality Bureau

Montana Air Quality Permit #5274-01

ONEOK Rockies Midstream, LLC
Western Compressor Station
100 W. Fifth St.
Tulsa, OK 74103

March 31, 2023



MONTANA AIR QUALITY PERMIT

Issued To: ONEOK Rockies Midstream, LLC
Western Compressor Station
100 W. Fifth St.
Tulsa, OK 74103

MAQP: #5274-01
Application Complete: 3/2/2023
Department's Decision Issued: 3/15/2023
Permit Final: 3/31/2023

A Montana Air Quality Permit (MAQP), with conditions, is hereby granted to ONEOK Rockies Midstream, LLC (ONEOK), pursuant to Sections 75-2-204 and 211 of the Montana Code Annotated (MCA), as amended, and Administrative Rules of Montana (ARM) 17.8.740, *et seq.*, as amended, for the following:

Section I: Permitted Facilities

A. Plant Location

The Western Compressor Station is located at the Southwest Quarter of the Southwest Quarter of Section 24, Township 25N, Range 58E in Richland County at 47.8993 degrees latitude and -104.18 degrees longitude. The street address is County Road 350, Fairview, MT 59221 in Richland County.

B. Current Permit Action

On March 2, 2023, DEQ received a request for an administrative amendment (AA) to reflect the correct size of the engines in the permit, permit analysis and environmental assessment. Although the calculations and air quality analysis were reviewed and completed based on 2,492 Hp engines, the text states 1,680 Hp engines. The DEQ corrected the administrative error. The address for ONEOK was also updated under the action.

Section II: Conditions and Limitations

A. Emission Limitations

1. ONEOK shall operate no more than three natural gas compressor engines at the Western Compressor Station. The maximum capacity of each compressor engine shall not exceed 2,492 brake horsepower (bhp) (ARM 17.8.749).
2. Emissions from each of three (3) 2,492-bhp rich burn Waukesha compressor engines shall be controlled by a non-selective catalytic reduction (NSCR) unit and an air to fuel ratio (AFR) controller. **Emissions from each of the engines shall not exceed the following limits (ARM 17.8.752):**

Oxides of Nitrogen (NO _x)	3.70 lb/hr
Carbon Monoxide (CO)	3.70 lb/hr

3. ONEOK shall operate a Process Flare (FL-1) to control emissions from facility blowdowns and volatile organic compounds (VOC) from condensate tanks (ARM 17.8.752).
4. ONEOK shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any sources installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304).
5. ONEOK shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter (ARM 17.8.308).
6. ONEOK shall treat all unpaved portions of the haul roads, access roads, parking lots, or general plant area with water and/or chemical dust suppressant as necessary to maintain compliance with the reasonable precaution limitation in Section II.A.5 (ARM 17.8.749).
7. ONEOK shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements contained in 40 CFR 60, Subpart JJJJ, *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines* and 40 CFR 63, Subpart ZZZZ, *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, for any applicable diesel engine (ARM 17.8.340; 40 CFR 60, Subpart JJJJ; ARM 17.8.342 and 40 CFR 63, Subpart ZZZZ).
8. ONEOK shall comply with any applicable requirements of 40 CFR 60 Subpart OOOOa – Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for any affected facilities which are constructed, modified, or reconstructed after September 18, 2015. (ARM 17.8.340 and 40 CFR 60 Subpart OOOOa).

B. Testing Requirements

1. Each of the 2,492 bhp Waukesha compressor engines shall be tested for NO_x and CO, concurrently, to demonstrate compliance with the emissions limits in Section II.A.2. Testing shall occur on an every 4-year basis, or according to another testing/monitoring schedule as may be approved by DEQ (ARM 17.8.105 and ARM 17.8.749).
2. All compliance source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).
3. The DEQ may require further testing (ARM 17.8.105).

C. Operational Reporting Requirements

1. ONEOK shall supply DEQ with annual production information for all emission points, as required by DEQ in the annual emission inventory request. The

request will include, but is not limited to, all sources of emissions identified in the emission inventory contained in the permit analysis.

Production information shall be gathered on a calendar-year basis and submitted to DEQ by the date required in the emission inventory request. Information shall be in the units required by DEQ. This information may be used to calculate operating fees, based on actual emissions from the facility, and/or to verify compliance with permit limitations (ARM 17.8.505).

2. ONEOK shall notify DEQ of any construction or improvement project conducted, pursuant to ARM 17.8.745, that would include *the addition of a new emissions unit*, change in control equipment, stack height, stack diameter, stack flow, stack gas temperature, source location, or fuel specifications, or would result in an increase in source capacity above its permitted operation. The notice must be submitted to DEQ, in writing, 10 days prior to startup or use of the proposed de minimis change, or as soon as reasonably practicable in the event of an unanticipated circumstance causing the de minimis change and must include the information requested in ARM 17.8.745(l)(d) (ARM 17.8.745).
3. All records compiled in accordance with this permit must be maintained by ONEOK as a permanent business record for at least 5 years following the date of the measurement, must be available at the plant site for inspection by DEQ, and must be submitted to DEQ upon request. These records may be stored at a location other than the plant site upon approval by DEQ (ARM 17.8.749).

SECTION III: General Conditions

- A. Inspection – ONEOK shall allow DEQ’s representatives access to the source at all reasonable times for the purpose of making inspections or surveys, collecting samples, obtaining data, auditing any monitoring equipment such as Continuous Emission Monitoring Systems (CEMS) or Continuous Emission Rate Monitoring Systems (CERMS), or observing any monitoring or testing, and otherwise conducting all necessary functions related to this permit.
- B. Waiver – The permit and the terms, conditions, and matters stated herein shall be deemed accepted if ONEOK fails to appeal as indicated below.
- C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving ONEOK of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq.* (ARM 17.8.756).
- D. Enforcement – Violations of limitations, conditions and requirements contained herein may constitute grounds for permit revocation, penalties, or other enforcement action as specified in Section 75-2-401, *et seq.*, MCA.
- E. Appeals – Any person or persons jointly or severally adversely affected by DEQ’s decision may request, within 15 days after DEQ renders its decision, upon affidavit setting forth the grounds therefor, a hearing before the Board of Environmental

Review (Board). A hearing shall be held under the provisions of the Montana Administrative Procedures Act. The filing of a request for a hearing does not stay DEQ's decision, unless the Board issues a stay upon receipt of a petition and a finding that a stay is appropriate under Section 75-2-211(11)(b), MCA. The issuance of a stay on a permit by the Board postpones the effective date of DEQ's decision until conclusion of the hearing and issuance of a final decision by the Board. If a stay is not issued by the Board, DEQ's decision on the application is final 16 days after DEQ's decision is made.

- F. Permit Inspection – As required by ARM 17.8.755, Inspection of Permit, a copy of the air quality permit shall be made available for inspection by DEQ at the location of the source.
- G. Permit Fee – Pursuant to Section 75-2-220, MCA, failure to pay the annual operation fee by ONEOK may be grounds for revocation of this permit, as required by that section and rules adopted thereunder by the Board.
- H. Duration of Permit – Construction or installation must begin, or contractual obligations entered into that would constitute substantial loss within 3 years of permit issuance and proceed with due diligence until the project is complete or the permit shall expire (ARM 17.8.762).

Montana Air Quality Permit Analysis
ONEOK Rockies Midstream, LLC
Western Compressor Station
MAQP #5274-01

I. Introduction/Process Description

A. Permitted Equipment

ONEOK Rockies Midstream, LLC (ONEOK) – Western Compressor Station natural gas compressor station consisting of the following equipment:

- a. Three (3) 2,492 brake horsepower (bhp) Waukesha compressor engines for the purpose of natural gas gathering.
- b. Three (3) 400-bbl condensate tanks, one (1) 400-bbl produced water tank, one (1) 400-bbl methanol tank.
- c. One (1) process/VOC flare for controlling emissions from the condensate, produced water, and emergency and relief venting from all equipment.
- d. Miscellaneous support equipment and materials equipment. Associated emission sources include condensate truck loading, fugitive emissions, and miscellaneous vents and blowdowns.

B. Source Description

ONEOK operates a natural gas compressor station located at the Southwest Quarter of the Southwest Quarter of Section 24, Township 25N, Range 58E in Richland County at 47.8993 degrees latitude and -104.18 degrees longitude. The facility is known as the Western Compressor Station.

C. Permit History

MAQP #5274-00

On 4/2/2022, DEQ received an air quality permit application to construct and operate a natural gas compressor station known as the Western Compressor Station. MAQP #5274-00 was issued on final on January 4, 2023.

D. Current Permit Action

On March 2, 2023, DEQ received a request for an administrative amendment (AA) to reflect the correct size of the engines in the permit, permit analysis and environmental assessment. Although the calculations and air quality analysis were reviewed and completed based on 2,492 Hp engines, the text states 1,680 Hp engines. DEQ corrected the administrative error. The address for ONEOK was also updated under the action. **MAQP #5274-01** replaces MAQP #5274-00.

II. Applicable Rules and Regulations

The following are partial explanations of some applicable rules and regulations that apply to the facility.

The complete rules are stated in the Administrative Rules of Montana (ARM) and are available, upon request, from the Department of Environmental Quality (DEQ). Upon request, DEQ will provide references for location of complete copies of all applicable rules and regulations or copies where appropriate.

A. ARM 17.8, Subchapter 1 – General Provisions, including but not limited to:

1. ARM 17.8.101 Definitions. This rule includes a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.105 Testing Requirements. Any person or persons responsible for the emission of any air contaminant into the outdoor atmosphere shall, upon written request of DEQ, provide the facilities and necessary equipment (including instruments and sensing devices) and shall conduct tests, emission or ambient, for such periods of time as may be necessary using methods approved by DEQ.
3. ARM 17.8.106 Source Testing Protocol. The requirements of this rule apply to any emission source testing conducted by DEQ, any source or other entity as required by any rule in this chapter, or any permit or order issued pursuant to this chapter, or the provisions of the Clean Air Act of Montana, 75-2-101, *et seq.*, Montana Code Annotated (MCA).

ONEOK shall comply with the requirements contained in the Montana Source Test Protocol and Procedures Manual, including, but not limited to, using the proper test methods, and supplying the required reports. A copy of the Montana Source Test Protocol and Procedures Manual is available from DEQ upon request.

4. ARM 17.8.110 Malfunctions. (2) DEQ must be notified promptly by telephone whenever a malfunction occurs that can be expected to create emissions in excess of any applicable emission limitation or to continue for a period greater than 4 hours.
5. ARM 17.8.111 Circumvention. (1) No person shall cause or permit the installation or use of any device or any means that, without resulting in reduction of the total amount of air contaminant emitted, conceals, or dilutes an emission of air contaminant that would otherwise violate an air pollution control regulation. (2) No equipment that may produce emissions shall be operated or maintained in such a manner as to create a public nuisance.

B. ARM 17.8, Subchapter 2 – Ambient Air Quality, including, but not limited to the following:

1. ARM 17.8.204 Ambient Air Monitoring
2. ARM 17.8.210 Ambient Air Quality Standards for Sulfur Dioxide
3. ARM 17.8.211 Ambient Air Quality Standards for Nitrogen Dioxide

4. ARM 17.8.212 Ambient Air Quality Standards for Carbon Monoxide
5. ARM 17.8.213 Ambient Air Quality Standard for Ozone
6. ARM 17.8.214 Ambient Air Quality Standard for Hydrogen Sulfide
7. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter
8. ARM 17.8.221 Ambient Air Quality Standard for Visibility
9. ARM 17.8.222 Ambient Air Quality Standard for Lead
10. ARM 17.8.223 Ambient Air Quality Standard for PM₁₀

ONEOK must maintain compliance with the applicable ambient air quality standards.

C. ARM 17.8, Subchapter 3 – Emission Standards, including, but not limited to:

1. ARM 17.8.304 Visible Air Contaminants. This rule requires that no person may cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes.
2. ARM 17.8.308 Particulate Matter, Airborne. (1) This rule requires an opacity limitation of less than 20% for all fugitive emission sources and that reasonable precautions be taken to control emissions of airborne particulate matter. (2) Under this rule, ONEOK shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter.
3. ARM 17.8.309 Particulate Matter, Fuel Burning Equipment. This rule requires that no person shall cause, allow, or permit to be discharged into the atmosphere particulate matter caused by the combustion of fuel in excess of the amount determined by this rule.
4. ARM 17.8.310 Particulate Matter, Industrial Process. This rule requires that no person shall cause, allow, or permit to be discharged into the atmosphere particulate matter in excess of the amount set forth in this rule.
5. ARM 17.8.322 Sulfur Oxide Emissions--Sulfur in Fuel. This rule requires that no person shall burn liquid, solid, or gaseous fuel in excess of the amount set forth in this rule.
7. ARM 17.8.324 Hydrocarbon Emissions--Petroleum Products. (3) No person shall load or permit the loading of gasoline into any stationary tank with a capacity of 250 gallons or more from any tank truck or trailer, except through a permanent submerged fill pipe, unless such tank is equipped with a vapor loss control device as described in (1) of this rule.
8. ARM 17.8.340 Standard of Performance for New Stationary Sources and Emission Guidelines for Existing Sources. This rule incorporates, by reference, 40 CFR Part 60, Standards of Performance for New Stationary Sources (NSPS). ONEOK is considered an NSPS affected facility under 40 CFR Part 60 and is subject to the requirements of the following subparts.

- a. 40 CFR 60, Subpart A – General Provisions apply to all equipment or facilities subject to an NSPS Subpart as listed below:
 - b. 40 CFR 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (SI ICE). The proposed compressor engines were manufactured after July 1, 2010; therefore, they will be subject to the Stage 2 emissions limitations of this subpart.
 - c. 40 CFR 60 Subpart OOOOa – Standards of Performance for Crude Oil and Natural Gas Production, Transmissions, and Distribution is applicable for affected units for which Construction, Modification, or Reconstruction Commenced after September 18, 2015.
9. ARM 17.8.342 Emission Standards for Hazardous Air Pollutants for Source Categories. The source, as defined and applied in 40 CFR Part 63, shall comply with the requirements of 40 CFR Part 63, as listed below:
- a. 40 CFR 63, Subpart A – General Provisions apply to all equipment or facilities subject to NESHAP Subpart(s) as listed below:
 - b. 40 CFR 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE). An owner or operator of a stationary RICE at a major or area source of HAP emissions is subject to this subpart, except if the stationary RICE is being tested at a stationary RICE test cell/stand. Therefore, ONEOK is subject to this subpart.
- D. ARM 17.8, Subchapter 5 – Air Quality Permit Application, Operation, and Open Burning Fees, including, but not limited to:
- 1. ARM 17.8.504 Air Quality Permit Application Fees. This rule requires that an applicant submit an air quality permit application fee concurrent with the submittal of an air quality permit application. A permit application is incomplete until the proper application fee is paid to DEQ. A permit application and fee were received by DEQ.
 - 2. ARM 17.8.505 Air Quality Operation Fees. An annual air quality operation fee must, as a condition of continued operation, be submitted to DEQ by each source of air contaminants holding an air quality permit (excluding an open burning permit) issued by DEQ. The air quality operation fee is based on the actual or estimated actual amount of air pollutants emitted during the previous calendar year.

An air quality operation fee is separate and distinct from an air quality permit application fee. The annual assessment and collection of the air quality operation fee, described above, shall take place on a calendar-year basis. DEQ may insert into any final permit issued after the effective date of these rules, such conditions as may be

necessary to require the payment of an air quality operation fee on a calendar-year basis, including provisions that prorate the required fee amount.

- E. ARM 17.8, Subchapter 7 – Permit, Construction, and Operation of Air Contaminant Sources, including, but not limited to:
1. ARM 17.8.740 Definitions. This rule is a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
 2. ARM 17.8.743 Montana Air Quality Permits--When Required. This rule requires a person to obtain an air quality permit or permit modification to construct, modify, or use any air contaminant sources that have the potential to emit (PTE) greater than 25 tons per year of any pollutant. ONEOK has a PTE greater than 25 tons per year of NO_x, CO, and VOC; therefore, an air quality permit is required.
 3. ARM 17.8.744 Montana Air Quality Permits--General Exclusions. This rule identifies the activities that are not subject to the Montana Air Quality Permit program.
 4. ARM 17.8.745 Montana Air Quality Permits--Exclusion for De Minimis Changes. This rule identifies the de minimis changes at permitted facilities that do not require a permit under the Montana Air Quality Permit Program.
 5. ARM 17.8.748 New or Modified Emitting Units--Permit Application Requirements.
(1) This rule requires that a permit application be submitted prior to installation, modification, or use of a source. A permit application was not required for the current permit action because the permit change is considered an administrative permit change. (7) This rule requires that the applicant notify the public by means of legal publication in a newspaper of general circulation in the area affected by the application for a permit. An affidavit of publication of public notice was not required for the current permit action because the permit change is considered an administrative permit change.
 6. ARM 17.8.749 Conditions for Issuance or Denial of Permit. This rule requires that the permits issued by DEQ must authorize the construction and operation of the facility or emitting unit subject to the conditions in the permit and the requirements of this subchapter. This rule also requires that the permit must contain any conditions necessary to assure compliance with the Federal Clean Air Act (FCAA), the Clean Air Act of Montana, and rules adopted under those acts.
 7. ARM 17.8.752 Emission Control Requirements. This rule requires a source to install the maximum air pollution control capability that is technically practicable and economically feasible, except that BACT shall be utilized. The required BACT analysis is included in Section III of this permit analysis.
 8. ARM 17.8.755 Inspection of Permit. This rule requires that air quality permits shall be made available for inspection by DEQ at the location of the source.

9. ARM 17.8.756 Compliance with Other Requirements. This rule states that nothing in the permit shall be construed as relieving ONEOK of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq.*
 10. ARM 17.8.762 Duration of Permit. An air quality permit shall be valid until revoked or modified, as provided in this subchapter, except that a permit issued prior to construction of a new or modified source may contain a condition providing that the permit will expire unless construction is commenced within the time specified in the permit, which in no event may be less than 1 year after the permit is issued.
 11. ARM 17.8.763 Revocation of Permit. An air quality permit may be revoked upon written request of the permittee, or for violations of any requirement of the Clean Air Act of Montana, rules adopted under the Clean Air Act of Montana, the FCAA, rules adopted under the FCAA, or any applicable requirement contained in the Montana State Implementation Plan (SIP).
 12. ARM 17.8.764 Administrative Amendment to Permit. An air quality permit may be amended for changes in any applicable rules and standards adopted by the Board of Environmental Review (Board) or changed conditions of operation at a source or stack that do not result in an increase of emissions as a result of those changed conditions. The owner or operator of a facility may not increase the facility's emissions beyond permit limits unless the increase meets the criteria in ARM 17.8.745 for a de minimis change not requiring a permit, or unless the owner or operator applies for and receives another permit in accordance with ARM 17.8.748, ARM 17.8.749, ARM 17.8.752, ARM 17.8.755, and ARM 17.8.756, and with all applicable requirements in ARM Title 17, Chapter 8, Subchapters 8, 9, and 10.
 13. ARM 17.8.765 Transfer of Permit. This rule states that an air quality permit may be transferred from one person to another if written notice of intent to transfer, including the names of the transferor and the transferee, is sent to DEQ.
- F. ARM 17.8, Subchapter 8 – Prevention of Significant Deterioration of Air Quality, including, but not limited to:
1. ARM 17.8.801 Definitions. This rule is a list of applicable definitions used in this subchapter.
 2. ARM 17.8.818 Review of Major Stationary Sources and Major Modifications--Source Applicability and Exemptions. The requirements contained in ARM 17.8.819 through ARM 17.8.827 shall apply to any major stationary source and any major modification, with respect to each pollutant subject to regulation under the FCAA that it would emit, except as this subchapter would otherwise allow. This facility is not a major stationary source.
- G. ARM 17.8, Subchapter 12 – Operating Permit Program Applicability, including, but not limited to:

1. ARM 17.8.1201 Definitions. (23) Major Source under Section 7412 of the FCAA is defined as any source having:
 - a. PTE > 100 tons/year of any pollutant;
 - b. PTE > 10 tons/year of any one hazardous air pollutant (HAP), PTE > 25 tons/year of a combination of all HAPs, or lesser quantity as DEQ may establish by rule; or
 - c. PTE > 70 tons/year of particulate matter with an aerodynamic diameter of 10 microns or less (PM₁₀) in a serious PM₁₀ nonattainment area.

2. ARM 17.8.1204 Air Quality Operating Permit Program. (1) Title V of the FCAA amendments of 1990 requires that all sources, as defined in ARM 17.8.1204(1), obtain a Title V Operating Permit. In reviewing and issuing MAQP #5274-01 for ONEOK, the following conclusions were made:
 - a. The facility's PTE is less than 100 tons/year for any pollutant.
 - b. The facility's PTE is less than 10 tons/year for any one HAP and less than 25 tons/year for all HAPs.
 - c. This source is not located in a PM₁₀ nonattainment area.
 - d. This facility is subject to current NSPS (40 CFR 60 Subparts A and OOOOa).
 - e. This facility is subject to current NESHAP (40 CFR 63 Subparts A, HH, and ZZZZ).
 - f. This source is not a Title IV affected source.
 - g. This source is not a solid waste combustion unit.
 - h. This source is not an EPA designated Title V source.

Based on these facts, DEQ determined that ONEOK will be a minor source of emissions as defined under Title V. However, if minor sources subject to NSPS are required to obtain a Title V Operating Permit, ONEOK will be required to obtain a Title V Operating Permit.

III. BACT Analysis

A BACT analysis was not required for the current permit action because the current permit action is considered an administrative permit action.

IV. Emission Inventory

**ONEOK Rockies Midstream, L.L.C.
Western Compressor Station
Facility Emissions Summary - Annual**

Unit ID	Description	NOx	CO	VOE	SO2	PM	HCHO	HAP	CO2e
		TPY	TPY	TPY	TPY	TPY	TPY	TPY	TPY
C-1	2,492-hp Waukesha P9394GSI S5 Engine	20.78	15.16	1.20	0.05	1.53	0.72	1.19	14,062.49
C-2	2,492-hp Waukesha P9394GSI S5 Engine	20.78	15.16	1.20	0.05	1.53	0.72	1.19	14,062.49
C-3	2,492-hp Waukesha P9394GSI S5 Engine	20.78	15.16	1.20	0.05	1.53	0.72	1.19	14,062.49
FL-1	ProcessNOC Flare	1.06	2.56	4.65	<0.01	0.05	<0.01	0.03	1,524.66
TK-1	400-bbl Condensate Tank	-	-	4.10	-	-	--	0.22	9.12
TK-2	400-bbl Condensate Tank	-	-	0.58	-	-	-	0.22	9.12
TK-3	400-bbl Condensate Tank	--	-	0.58	-	-	-	0.22	9.12
WTK-1	400-bbl Produced Water Tank	-	-	0.02	-	-	--	<0.01	0.05
TL-1	Condensate Truck Loading	-	-	14.55	-	-	-	0.77	0.02
MTK-1	400-bbl Methanol Tank	-	-	0.34	-	-	-	0.34	-
FUG	Fugitive Emissions	-	-	11.71	--	-	--	1.18	185.26
BO	Miscellaneous Ventin and Slowdowns to Atmosphere	-	--	5.80	-	-	--	0.11	144.66
Total=		64.46	50.60	50.57	0.15	4.67	2.17	6.68	45,594.14

Notes:

- 1) Tank emissions are routed to the ProcessNOC Flare which is a single stack. Unburned VOC and HAP reported at the tanks.
- 2) ORM requests a federally enforceable limits of 5.99 tons per year per each condensate tank and produced water tank.
- 1) Miscellaneous venting and blowdowns to atmosphere include, but are not limited to, miscellaneous planned and unplanned venting to atmosphere from pressure relief valves, startup, shut-down, maintenance, compressor blowdowns, pigging actions, and/or pneumatic controllers.

**ONEOK Rockies Midstream, L.L.C.
Western Compressor Station
Facility Emissions Summary - Hourly**

Unit ID	Description	NOx	CO	VOE	SO ₂	PM	HCHO	HAP	CO _{2e}
		lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr
C-1	2,492-hp Waukesha P9394GSI S5 Engine	4.74	3.46	0.27	0.01	0.35	0.16	0.27	3,210.61
C-2	2,492-hp Waukesha P9394GSI S5 Engine	4.74	3.46	0.27	0.01	0.35	0.16	0.27	3,210.61
C-3	2,492-hp Waukesha P9394GSI S5 Engine	4.74	3.46	0.27	0.01	0.35	0.16	0.27	3,210.61
FL-1	ProcessNOC Flare	0.40	1.32	1.93	<0.01	0.01	<0.01	0.02	649.67
TK-1	400-bbl Condensate Tank	-	-	0.94	-	-	-	0.05	2.08
TK-2	400-bbl Condensate Tank	-	-	0.13	-	-	-	0.05	2.08
TK-3	400-bbl Condensate Tank	-	-	0.13	-	-	-	0.05	2.08
WTK-1	400-bbl Produced Water Tank	-	-	<0.01	-	-	-	<0.01	0.01
TL-1	Condensate Truck Loading	-	-	3.32	-	-	-	0.18	<0.01
MTK-1	400-bbl Methanol Tank	-	-	0.08	-	-	-	0.08	-
FUG	Fugitive Emissions	-	-	2.67	-	-	-	0.27	42.30
BD	Miscellaneous Venting and Slowdowns to Atmosphere	-	-	-	-	-	-	-	-
Total=		15.04	13.02	14.78	0.03	1.07	0.49	1.67	10,986.00

ONEOK Rockies Midstream, L.L.C.
Western Compressor Station
Engine Information and Manufacturer Emission Factors

Equipment Information			
	C-1	C-2	C-3
Make	Waukesha	Waukesha	Waukesha
Model	P9394 GSI Series 5	P9394 GSI Series 5	P9394 GSI Series 5
Design Rating (hp)	2,492	2,492	2,492
Fuel Consumption (Btu/hp-hr)	7,205	7,205	7,205
Fuel Consumption (scfh)	17,603	17,603	17,603
Fuel Consumption (mmBtu/hr)	17.95	17.95	17.95
Fuel Consumption (scf/yr)	154,200,562	154,200,562	154,200,562
Fuel Heating Value (Btu/scf)	1,020	1,020	1,020
Design Class	4S-RB	4S-RB	4S-RB
Controls	NSCR	NSCR	NSCR
Operating Hours	8,760	8,760	8,760
Stack Height (ft)	30.0	30.0	30.0
Stack Diameter (ft)	4.5	4.5	4.5
Exhaust Temperature (°F)	1,117	1,117	1,117
Exhaust Flow (acfm)	10,512	10,512	10,512
Exhaust Flow (scfh)	211,173	211,173	211,173
Exit Velocity (ft/s)	11.02	11.02	11.02

Uncontrolled Emission Factors			
	C-1	C-2	C-3
NOx (g/hp-hr)	12.70	12.70	12.70
CO (g/hp-hr)	6.30	6.30	6.30
VOE (a/hp-hr)	0.10	0.10	0.10
Formaldehyde (g/hp-hr)	0.05	0.05	0.05
CO₂ (g/hp-hr)	584.00	584.00	584.00

Control Efficiency			
	C-1	C-2	C-3
NOx	93.20%	93.20%	93.20%
CO	90.00%	90.00%	90.00%
VOE	50.00%	50.00%	50.00%
Formaldehyde	40.00%	40.00%	40.00%

Post-Control Emission Factors			
	C-1	C-2	C-3
NOx (g/hp-hr)	0.86	0.86	0.86
CO (g/hp-hr)	0.63	0.63	0.63
VOE (a/hp-hr)	0.05	0.05	0.05
Formaldehyde (g/hp-hr)	0.03	0.03	0.03
CO₂ (g/hp-hr)	584.00	584.00	584.00

Notes:

- 1) Emission factors based on manufacturer specifications.

**ONEOK Rockies Midstream, L.L.C.
Western Compressor Station
Engine Emissions Calculations**

Unit ID:

C-1

Pollutant	Emission Factor	Capacity	Conversion	Hourly Emissions	Operating Hours	Conversion	Annual Emissions
NOx	8.64E-01 g/hp-hr X	2,492 hp	0.00220462 lb/gr	= 4.74 lb/hr	X 8,760	0.0005 ton/lb	= 20.78 TPY
CO	6.30E-01 g/hp-hr X	2,492 hp	0.00220462 lb/gr	= 3.46 lb/hr	X 8,760	0.0005 ton/lb	= 15.16 TPY
VOE	5.00E-02 g/hp-hr X	2,492 hp	0.00220462 lb/gr	= 0.27 lb/hr	X 8,760	0.0005 ton/lb	= 1.20 TPY
SO _x	5.88E-04 lb/mmBtu X	17.95 mmBtu/hr	-	= 0.01 lb/hr	X 8,760	0.0005 ton/lb	= 0.05 TPY
PM ₁₀	9.50E-03 lb/mmBtu X	17.95 mmBtu/hr	-	= 0.17 lb/hr	X 8,760	0.0005 ton/lb	= 0.75 TPY
PM _{2.5}	9.91E-03 lb/mmBtu X	17.95 mmBtu/hr	-	= 0.18 lb/hr	X 8,760	0.0005 ton/lb	= 0.78 TPY
PM _{10-2.5}	1.94E-02 lb/mmBtu X	17.95 mmBtu/hr	-	= 0.35 lb/hr	X 8,760	0.0005 ton/lb	= 1.53 TPY
Acetaldehyde	1.40E-03 lb/mmBtu X	17.95 mmBtu/hr	-	= 0.03 lb/hr	X 8,760	0.0005 ton/lb	= 0.11 TPY
Acrolein	1.32E-03 lb/mmBtu X	17.95 mmBtu/hr	-	= 0.02 lb/hr	X 8,760	0.0005 ton/lb	= 0.10 TPY
Benzene	7.90E-04 lb/mmBtu X	17.95 mmBtu/hr	-	= 0.01 lb/hr	X 8,760	0.0005 ton/lb	= 0.06 TPY
Ethylbenzene	1.24E-05 lb/mmBtu X	17.95 mmBtu/hr	-	= <0.01 lb/hr	X 8,760	0.0005 ton/lb	= <0.01 TPY
Formaldehyde	3.00E-02 g/hp-hr X	2,492 hp	0.00220462 lb/gr	= 0.16 lb/hr	X 8,760	0.0005 ton/lb	= 0.72 TPY
Methanol	1.53E-03 lb/mmBtu X	17.95 mmBtu/hr	-	= 0.03 lb/hr	X 8,760	0.0005 ton/lb	= 0.12 TPY
Toluene	2.79E-04 lb/mmBtu X	17.95 mmBtu/hr	-	= 0.01 lb/hr	X 8,760	0.0005 ton/lb	= 0.02 TPY
Xylenes	9.75E-05 lb/mmBtu X	17.95 mmBtu/hr	-	= <0.01 lb/hr	X 8,760	0.0005 ton/lb	= 0.01 TPY
Other HAP	5.40E-04 lb/mmBtu X	17.95 mmBtu/hr	-	= 0.01 lb/hr	X 8,760	0.0005 ton/lb	= 0.04 TPY
CO	5.84E+02 g/hp-hr X	2,492.00 hp	0.00220462 lb/gr	= 3,208.45 lb/hr	X 8,760	0.0005 ton/lb	= 14,052.99 TPY
CH ₄	1.00E-03 kg/mmBtu X	17.95 mmBtu/hr	2.20462 lb/kg	= 0.04 lb/hr	X 8,760	0.0005 ton/lb	= 0.17 TPY
N ₂ O	1.00E-04 kg/mmBtu X	17.95 mmBtu/hr	2.20462 lb/kg	= <0.01 lb/hr	X 8,760	0.0005 ton/lb	= 0.02 TPY

**ONEOK Rockies Midstream, L.L.C.
Western Compressor Station
Engine Emissions Calculations**

Unit ID: C-2

Pollutant	Emission Factor	Capacity	Conversion	Hourly Emissions	Op. rating Hours	Conversion	Annual Emissions
NOx	8.64E-01 g/hp-hr X	2,492 hp X	0.00220462 lb/gr	= 4.74 lb/hr	X 8,760 X	0.0005 ton/lb	= 20.78 TPY
CO	6.30E-01 g/hp-hr X	2,492 hp X	0.00220462 lb/gr	= 3.46 lb/hr	X 8,760 X	0.0005 ton/lb	= 15.16 TPY
VOE	5.00E-02 g/hp-hr X	2,492 hp X	0.00220462 lb/gr	= 0.27 lb/hr	X 8,760 X	0.0005 ton/lb	= 1.20 TPY
SO _x	5.88E-04 lb/mmBtu X	17.95 mmBtu/hr X	-	= 0.01 lb/hr	X 8,760 X	0.0005 ton/lb	= 0.05 TPY
PM _{0.12}	9.50E-03 lb/mmBtu X	17.95 mmBtu/hr X	-	= 0.17 lb/hr	X 8,760 X	0.0005 ton/lb	= 0.75 TPY
PM _{coND}	9.91E-03 lb/mmBtu X	17.95 mmBtu/hr X	-	= 0.18 lb/hr	X 8,760 X	0.0005 ton/lb	= 0.78 TPY
PM ₁₀	1.94E-02 lb/mmBtu X	17.95 mmBtu/hr X	-	= 0.35 lb/hr	X 8,760 X	0.0005 ton/lb	= 1.53 TPY
Acetaldehyde	1.40E-03 lb/mmBtu X	17.95 mmBtu/hr X	-	= 0.03 lb/hr	X 8,760 X	0.0005 ton/lb	= 0.11 TPY
Acrolein	1.32E-03 lb/mmBtu X	17.95 mmBtu/hr X	-	= 0.02 lb/hr	X 8,760 X	0.0005 ton/lb	= 0.10 TPY
Benzene	7.90E-04 lb/mmBtu X	17.95 mmBtu/hr X	-	= 0.01 lb/hr	X 8,760 X	0.0005 ton/lb	= 0.06 TPY
Ethylbenzene	1.24E-05 lb/mmBtu X	17.95 mmBtu/hr X	-	= <0.01 lb/hr	X 8,760 X	0.0005 ton/lb	= <0.01 TPY
Formaldehyde	3.00E-02 g/hp-hr X	2,492 hp X	0.00220462 lb/gr	= 0.16 lb/hr	X 8,760 X	0.0005 ton/lb	= 0.72 TPY
Methanol	1.53E-03 lb/mmBtu X	17.95 mmBtu/hr X	-	= 0.03 lb/hr	X 8,760 X	0.0005 ton/lb	= 0.12 TPY
Toluene	2.79E-04 lb/mmBtu X	17.95 mmBtu/hr X	-	= 0.01 lb/hr	X 8,760 X	0.0005 ton/lb	= 0.02 TPY
Xylenes	9.75E-05 lb/mmBtu X	17.95 mmBtu/hr X	-	= <0.01 lb/hr	X 8,760 X	0.0005 ton/lb	= 0.01 TPY
Other HAP	5.40E-04 lb/mmBtu X	17.95 mmBtu/hr X	-	= 0.01 lb/hr	X 8,760 X	0.0005 ton/lb	= 0.04 TPY
CO	5.84E+02 g/hp-hr X	2,492.00 hp X	0.00220462 lb/gr	= 3,208.45 lb/hr	X 8,760 X	0.0005 ton/lb	= 14,052.99 TPY
CH ₄	1.00E-03 kg/mmBtu X	17.95 mmBtu/hr X	2.20462 lb/kg	= 0.04 lb/hr	X 8,760 X	0.0005 ton/lb	= 0.17 TPY
N ₂ O	1.00E-04 kg/mmBtu X	17.95 mmBtu/hr X	2.20462 lb/kg	= <0.01 lb/hr	X 8,760 X	0.0005 ton/lb	= 0.02 TPY

**ONEOK Rockies Midstream, L.L.C.
Western Compressor Station
Engine Emissions Calculations**

Unit ID: **C-3**

Pollutant	Emission Factor	Capacity	Conversion	Hourly Emissions	Operating Hours	Conversion	Annual Emissions
NO _x	8.64E-01 g/hp-hr X	2,492 hp X	0.00220462 lb/gr	= 4.74 lb/hr	X 8,760 X	0.0005 ton/lb	= 20.78 TPY
CO	6.30E-01 g/hp-hr X	2,492 hp X	0.00220462 lb/gr	= 3.46 lb/hr	X 8,760 X	0.0005 ton/lb	= 15.16 TPY
VOG	5.00E-02 g/hp-hr X	2,492 hp X	0.00220462 lb/gr	= 0.27 lb/hr	X 8,760 X	0.0005 ton/lb	= 1.20 TPY
SO _x	5.5BE-04 lb/mmBtu X	17.95 mmBtu/hr X	-	= 0.01 lb/hr	X 8,760 X	0.0005 ton/lb	= 0.05 TPY
PM ₁₀	9.50E-03 lb/mmBtu X	17.95 mmBtu/hr X	-	= 0.17 lb/hr	X 8,760 X	0.0005 ton/lb	= 0.75 TPY
PM _{coND}	9.91E-03 lb/mmBtu X	17.95 mmBtu/hr X	-	= 0.18 lb/hr	X 8,760 X	0.0005 ton/lb	= 0.78 TPY
PM _{10i}	1.94E-02 lb/mmBtu X	17.95 mmBtu/hr X	-	= 0.35 lb/hr	X 8,760 X	0.0005 ton/lb	= 1.53 TPY
Acetaldehyde	1.40E-03 lb/mmBtu X	17.95 mmBtu/hr X	-	= 0.03 lb/hr	X 8,760 X	0.0005 ton/lb	= 0.11 TPY
Acrolein	1.32E-03 lb/mmBtu X	17.95 mmBtu/hr X	-	= 0.02 lb/hr	X 8,760 X	0.0005 ton/lb	= 0.10 TPY
Benzene	7.90E-04 lb/mmBtu X	17.95 mmBtu/hr X	-	= 0.01 lb/hr	X 8,760 X	0.0005 ton/lb	= 0.06 TPY
Ethylbenzene	1.24E-05 lb/mmBtu X	17.95 mmBtu/hr X	-	= <0.01 lb/hr	X 8,760 X	0.0005 ton/lb	= <0.01 TPY
Formaldehyde	3.00E-02 g/hp-hr X	2,492 hp X	0.00220462 lb/gr	= 0.16 lb/hr	X 8,760 X	0.0005 ton/lb	= 0.72 TPY
Methanol	1.53E-03 lb/mmBtu X	17.95 mmBtu/hr X	-	= 0.03 lb/hr	X 8,760 X	0.0005 ton/lb	= 0.12 TPY
Toluene	2.79E-04 lb/mmBtu X	17.95 mmBtu/hr X	-	= 0.01 lb/hr	X 8,760 X	0.0005 ton/lb	= 0.02 TPY
Xylenes	9.75E-05 lb/mmBtu X	17.95 mmBtu/hr X	-	= <0.01 lb/hr	X 8,760 X	0.0005 ton/lb	= 0.01 TPY
Other HAP	5.40E-04 lb/mmBtu X	17.95 mmBtu/hr X	-	= 0.01 lb/hr	X 8,760 X	0.0005 ton/lb	= 0.04 TPY
CO ₂	5.84E+02 g/hp-hr X	2,492.00 hp X	0.00220462 lb/gr	= 3,208.45 lb/hr	X 8,760 X	0.0005 ton/lb	= 14,052.99 TPY
CH ₄	1.00E-03 kglmmBtu X	17.95 mmBtu/hr X	2.20462 lb/kg	= 0.04 lb/hr	X 8,760 X	0.0005 ton/lb	= 0.17 TPY
N ₂ O	1.00E-04 kg/mmBtu X	17.95 mmBtu/hr X	2.20462 lb/kg	= <0.01 lb/hr	X 8,760 X	0.0005 ton/lb	= 0.02 TPY

Health Risk Assessment

ONEOK Rockies Midstream, L.L.C. (ORM) is proposing to construct the Western Compressor Station, a new facility in Richland County. As a part of the project, ORM will construct a flare to destruct vapors from natural gas processes at the facility. Therefore, this serves as a summary of the assumptions, pollutants, and results of the assessment.

For the modeling analyses at the facility, AERMOD was used to estimate the maximum ground level concentrations for each of the pollutants evaluated. Specifically, Lakes AERMOD View Version 9.5 was used in modeling the emissions on an annual averaging time. Meteorological data was obtained from Grand Forks, Montana for both the surface data the upper air data. Terrain data was imported from the National Elevation Dataset (NED) using a 1-degree resolution.

The following table lists the stack parameters for the flare which are also included under section 4.0 for the flare within the construction permit application:

Unit ID	Unit Name	UTM – E (km)	UTM – N (km)
FL-1	Process/VOC Flare	561499	5305564

Unit ID	Release Height (ft)	Temp (°F)	Stack Diameter (ft)	Exit Gas Flow Rate (ft ³ /min)
FL-1	100.0	1,500	3.0	10,417

For the analysis, the fence line consists of receptors spaced at 25 meters. Beyond the fence line, the analysis consisted of a discrete grid with receptors placed 50 meters apart out to 2,500 meters in order to evaluate concentrations in the ambient air. Additionally, an analysis of the surrounding area showed that there were no residential or commercial areas within the radius of analysis.

The assessment was conducted on an annual basis for each of the pollutants in which emissions were provided to align with the incinerator requirements under §17.8.770. Additionally, toxicity values were obtained from the same MPCA code and used to compare to the results. The following table provides the pollutants that were included in the analysis, the concentrations that resulted, and the levels provided in both Table 1 and Table 2 of §17.8.770. Note that in the permit application, the emission rates are shown as down to two decimal places and may be represented as “<0.01”. For the purpose of this analysis, the actual values were used in the modeling software to obtain an accurate concentration.

Pollutant	Emission Rate (lb/hr)	Table 1 Concentration (µg/m ³)	Table 2 Concentration (µg/m ³)		1 st Highest Annual Result (µg/m ³)
			Chronic	Acute	
Formaldehyde	1.05e-4	7.69e-3	3.60e-2	3.70	<1.00e-5
Hexane	1.60e-2	-	2.00	-	9.10e-4
Benzene	1.31e-3	1.20e-2	7.10e-1	-	8.00e-5
Toluene	1.20e-3	-	4.00	-	7.00e-5
Ethylbenzene	9.53e-5	-	10.0	-	<1.00e-5
Xylene	4.02e-4	-	3.00	44.0	2.00e-5

As shown in the above table, resulting concentrations for each of the pollutants analyzed are well below any of the toxicity thresholds. The results in the above table combined with a lack of residential or commercial structures within a large radius around the facility demonstrates that there are no human health concerns that result from the project.

V. Existing Air Quality

The facility is located at County Road 350, Fairview, MT 59221 in Richland County. The air quality of the area is classified as either Better than National Standards or unclassified/attainment for the National Ambient Air Quality Standards (NAAQS) for criteria pollutants.

VI. Ambient Air Impact Analysis

DEQ determined, based on amount of allowable emission, that the impacts from this permitting action will be minor. DEQ believes it will not cause or contribute to a violation of any ambient air quality standard.

VII. Taking or Damaging Implication Analysis

As required by 2-10-105, MCA, DEQ conducted a private property taking and damaging assessment which is below.

The proposed action would take place on privately owned property and there are no private residences in the area of the proposed action. The analysis below in response to the Private Property Assessment Act indicates no impact. DEQ does not plan to deny the application or impose conditions that would restrict the regulated person's use of private property so as to constitute a taking. Further, if the application is complete, DEQ must act on the permit pursuant to § 75-2-218(2), MCA. Therefore, DEQ does not have discretion to take the action in another way that would have less impact on private property—its action is bound by a statute.

YES	NO	
X		1. Does the action pertain to land or water management or environmental regulation affecting private real property or water rights?
	X	2. Does the action result in either a permanent or indefinite physical occupation of private property?
	X	3. Does the action deny a fundamental attribute of ownership? (ex.: right to exclude others, disposal of property)
	X	4. Does the action deprive the owner of all economically viable uses of the property?
	X	5. Does the action require a property owner to dedicate a portion of property or to grant an easement? [If no, go to (6)].
		5a. Is there a reasonable, specific connection between the government requirement and legitimate state interests?
		5b. Is the government requirement roughly proportional to the impact of the proposed use of the property?
	X	6. Does the action have a severe impact on the value of the property? (Consider economic impact, investment-backed expectations, character of government action)
	X	7. Does the action damage the property by causing some physical disturbance with respect to the property in excess of that sustained by the public generally?
	X	7a. Is the impact of government action direct, peculiar, and significant?

YES	NO	
	X	7b. Has government action resulted in the property becoming practically inaccessible, waterlogged or flooded?
	X	7c. Has government action lowered property values by more than 30% and necessitated the physical taking of adjacent property or property across a public way from the property in question?
	X	Takings or damaging implications? (Taking or damaging implications exist if YES is checked in response to question 1 and also to any one or more of the following questions: 2, 3, 4, 6, 7a, 7b, 7c; or if NO is checked in response to questions 5a or 5b; the shaded areas)

Based on this analysis, the Department determined there are no taking or damaging implications associated with this permit action.

VIII. Environmental Assessment

This permitting action will not result in an increase of emissions from the facility and is considered an administrative action; therefore, an Environmental Assessment is not required.

Analysis Prepared By: Troy Burrows

Date: 3/15/2023