

David  
670-1162  
061-00218

# **NORTHEAST NATURAL ENERGY, LLC**

## **APPLICATION FOR GENERAL PERMIT**

**Yost Well Pad Production Facility  
Monongalia County, West Virginia**



98 Vanadium Road  
Bridgeville, PA 15017  
(412) 221-1100

# APPLICATION FOR G70-A GENERAL PERMIT

**Northeast Natural Energy, LLC**

**Yost Well Pad Production Facility**

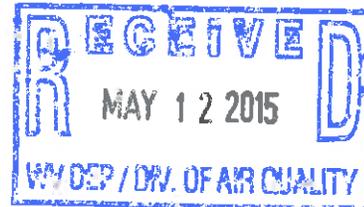
**Monongalia County, West Virginia**

## Table of Contents

**I. Application Form**

**II. Attachments**

- **Attachment A – Business Registration**
- **Attachment B – Process Description**
- **Attachment C – Description of Fugitive Emissions**
- **Attachment D – Process Flow Diagram**
- **Attachment E – Plot Plan**
- **Attachment F – Area Map**
- **Attachment G – Equipment Data Sheets and Registration Applicability Form**
- **Attachment H – Air Pollution Control Device Sheets**
- **Attachment I – Emission Calculations**
- **Attachment J – Class I Legal Advertisement**
- **Attachment N – Material Safety Data Sheets**
- **Attachment O – Emissions Summary Sheets**
- **Attachment P – Other Supporting Documentation**



---

**SECTION I**

**Application Form**



WEST VIRGINIA  
 DEPARTMENT OF ENVIRONMENTAL PROTECTION  
 DIVISION OF AIR QUALITY  
 601 57<sup>th</sup> Street, SE  
 Charleston, WV 25304  
 Phone: (304) 926-0475 • www.dep.wv.gov/daq

**APPLICATION FOR GENERAL PERMIT REGISTRATION**  
 CONSTRUCT, MODIFY, RELOCATE OR ADMINISTRATIVELY UPDATE  
 A STATIONARY SOURCE OF AIR POLLUTANTS

- CONSTRUCTION     MODIFICATION     RELOCATION     CLASS I ADMINISTRATIVE UPDATE  
 CLASS II ADMINISTRATIVE UPDATE

**CHECK WHICH TYPE OF GENERAL PERMIT REGISTRATION YOU ARE APPLYING FOR:**

- |  |  |
|--|--|
| <input type="checkbox"/> G10-D – Coal Preparation and Handling                                   | <input type="checkbox"/> G40-C – Nonmetallic Minerals Processing                             |
| <input type="checkbox"/> G20-B – Hot Mix Asphalt   | <input type="checkbox"/> G50-B – Concrete Batch  |
| <input type="checkbox"/> G30-D – Natural Gas Compressor Stations                                 | <input type="checkbox"/> G60-C – Class II Emergency Generator                                |
| <input type="checkbox"/> G33-A – Spark Ignition Internal Combustion Engines                      | <input type="checkbox"/> G65-C – Class I Emergency Generator                                 |
| <input type="checkbox"/> G35-A – Natural Gas Compressor Stations (Flare/Glycol Dehydration Unit) | <input checked="" type="checkbox"/> G70-A – Class II Oil and Natural Gas Production Facility |

**SECTION I. GENERAL INFORMATION**

1. Name of applicant (as registered with the WV Secretary of State's Office):  <b>Northeast Natural Energy, LLC</b>	2. Federal Employer ID No. (FEIN):  <b>270945493</b>
3. Applicant's mailing address:  48 Donley Street Suite 601 Morgantown, WV 26501	4. Applicant's physical address:  48 Donley Street Suite 601 Morgantown, WV 26501
5. If Applicant is a subsidiary corporation, please provide the name of parent corporation. <b>N/A</b>	

**WV BUSINESS REGISTRATION.** Is the applicant a resident of the State of West Virginia?  YES     NO

IF YES, provide a copy of the Certificate of Incorporation/ Organization / Limited Partnership (one page) including any name change amendments or other Business Registration Certificate as Attachment A.

IF NO, provide a copy of the Certificate of Authority / Authority of LLC / Registration (one page) including any name change amendments or other Business Certificate as Attachment A.

**SECTION II. FACILITY INFORMATION**

7. Type of plant or facility (stationary source) to be constructed, modified, relocated or administratively updated (e.g., coal preparation plant, primary crusher, etc.):  <b>Natural Gas Well Pad Production Facility</b>	8a. Standard Industrial Classification Classification (SIC) code: 1311	AND	8b. North American Industry System (NAICS) code: 211111
9. DAQ Plant ID No. (for existing facilities only):	10. List all current 45CSR13 and other General Permit numbers associated with this process (for existing facilities only):  _____  _____		

**A: PRIMARY OPERATING SITE INFORMATION**

<p>11A. Facility name of primary operating site: <b>Yost Well Pad</b></p>	<p>12A. Address of primary operating site:</p> <p>Mailing: <b>None</b> Physical: _____</p>	
<p>13A. Does the applicant own, lease, have an option to buy, or otherwise have control of the proposed site? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>→ IF YES, please explain: <u>Applicant has a lease agreement with the land owner for installation of</u> <u>the Well Pad and associated equipment</u></p>		
<p>14A → For Modifications or Administrative Updates at an existing facility, please provide directions to the present location of the facility from the nearest state road;</p> <p>→ For Construction or Relocation permits, please provide directions to the proposed new site location from the nearest state road. Include a MAP as Attachment F.</p> <p><u>From Exit 155 on I-79, merge onto Chaplin Hill Road (CR 19/24) toward US Rt. 19/Star City. After 0.8 miles, turn left onto US Rt. 19. Continue</u> <u>On US Rt. 19 for 1.7 miles. Turn left on WV Rt. 7 and continue for 13.9 miles. Turn left onto WV Rt. 218 (Daybrook Road). Well site</u> <u>Access road will be on the right-hand side of the road after 7.6 miles on top of a hill.</u></p>		
<p>15A. Nearest city or town: <b>Fairview</b></p>	<p>16A. County: <b>Monongalia</b></p>	<p>17A. UTM Coordinates:</p> <p>Northing (KM): <u>4386.9459</u> Easting (KM): <u>567.3774</u> Zone: <u>17</u></p>
<p>18A. Briefly describe the proposed new operation or change (s) to the facility: <b>Natural gas production, separation of liquids and compression</b></p>		<p>19A. Latitude &amp; Longitude Coordinates (NAD83, Decimal Degrees to 5 digits):</p> <p>Latitude: <u>39.62963</u> Longitude: <u>-80.21489</u></p>

**B: 1<sup>ST</sup> ALTERNATE OPERATING SITE INFORMATION (only available for G20, G40, & G50 General Permits)**

<p>11B. Name of 1<sup>st</sup> alternate operating site:</p>	<p>12B. Address of 1<sup>st</sup> alternate operating site:</p> <p>Mailing: _____ Physical: _____</p>	
<p>13B. Does the applicant own, lease, have an option to buy, or otherwise have control of the proposed site? <input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>→ IF YES, please explain: _____</p> <p>→ IF NO, YOU ARE NOT ELIGIBLE FOR A PERMIT FOR THIS SOURCE.</p>		

14B. → For **Modifications or Administrative Updates** at an existing facility, please provide directions to the present location of the facility from the nearest state road;

→ For **Construction or Relocation** permits, please provide directions to the proposed new site location from the nearest state road. Include a **MAP as Attachment F**.

---



---

15B. Nearest city or town:	16B. County:	17B. UTM Coordinates: Northing (KM): _____ Easting (KM): _____ Zone: _____
----------------------------	--------------	---

18B. Briefly describe the proposed new operation or change (s) to the facility:	19B. Latitude & Longitude Coordinates (NAD83, Decimal Degrees to 5 digits): Latitude: _____ Longitude: _____
---	--

**C: 2<sup>ND</sup> ALTERNATE OPERATING SITE INFORMATION (only available for G20, G40, & G50 General Permits):**

11C. Name of 2 <sup>nd</sup> alternate operating site: _____	12C. Address of 2 <sup>nd</sup> alternate operating site: Mailing: _____ Physical: _____
---	---

13C. Does the applicant own, lease, have an option to buy, or otherwise have control of the proposed site?  YES  NO

→ IF YES, please explain: \_\_\_\_\_

→ IF NO, YOU ARE NOT ELIGIBLE FOR A PERMIT FOR THIS SOURCE.

14C. → For **Modifications or Administrative Updates** at an existing facility, please provide directions to the present location of the facility from the nearest state road;

→ For **Construction or Relocation** permits, please provide directions to the proposed new site location from the nearest state road. Include a **MAP as Attachment F**.

---



---

15C. Nearest city or town:	16C. County:	17C. UTM Coordinates: Northing (KM): _____ Easting (KM): _____ Zone: _____
----------------------------	--------------	---

18C. Briefly describe the proposed new operation or change (s) to the facility:	19C. Latitude & Longitude Coordinates (NAD83, Decimal Degrees to 5 digits): Latitude: _____ Longitude: _____
---	--

20. Provide the date of anticipated installation or change:

6 / 15 / 15

If this is an **After-The-Fact** permit application, provide the date upon which the proposed change did happen: :

/ /

22. Provide maximum projected **Operating Schedule** of activity/activities outlined in this application if other than 8760 hours/year. (Note: anything other than 24/7/52 may result in a restriction to the facility's operation).

Hours per day 24 Days per week 7 Weeks per year 52 Percentage of operation 100

21. Date of anticipated Start-up if registration is granted:

6/ 20 / 15

### SECTION III. ATTACHMENTS AND SUPPORTING DOCUMENTS

23. Include a check payable to WVDEP – Division of Air Quality with the appropriate application fee (per 45CSR22 and 45CSR13).

24. Include a Table of Contents as the first page of your application package.

All of the required forms and additional information can be found under the Permitting Section (General Permits) of DAQ's website, or requested by phone.

25. Please check all attachments included with this permit application. Please refer to the appropriate reference document for an explanation of the attachments listed below.

- ATTACHMENT A : CURRENT BUSINESS CERTIFICATE
- ATTACHMENT B: PROCESS DESCRIPTION
- ATTACHMENT C: DESCRIPTION OF FUGITIVE EMISSIONS
- ATTACHMENT D: PROCESS FLOW DIAGRAM
- ATTACHMENT E: PLOT PLAN
- ATTACHMENT F: AREA MAP
- ATTACHMENT G: EQUIPMENT DATA SHEETS AND REGISTRATION SECTION APPLICABILITY FORM
- ATTACHMENT H: AIR POLLUTION CONTROL DEVICE SHEETS
- ATTACHMENT I: EMISSIONS CALCULATIONS
- ATTACHMENT J: CLASS I LEGAL ADVERTISEMENT
- ATTACHMENT K: ELECTRONIC SUBMITTAL
- ATTACHMENT L: GENERAL PERMIT REGISTRATION APPLICATION FEE
- ATTACHMENT M: SITING CRITERIA WAIVER
- ATTACHMENT N: MATERIAL SAFETY DATA SHEETS (MSDS)
- ATTACHMENT O: EMISSIONS SUMMARY SHEETS
- OTHER SUPPORTING DOCUMENTATION NOT DESCRIBED ABOVE (Equipment Drawings, Aggregation Discussion, etc.)

Please mail an original and two copies of the complete General Permit Registration Application with the signature(s) to the DAQ Permitting Section, at the address shown on the front page of this application. Please DO NOT fax permit applications. For questions regarding applications or West Virginia Air Pollution Rules and Regulations, please refer to the website shown on the front page of the application or call the phone number also provided on the front page of the application.

**SECTION IV. CERTIFICATION OF INFORMATION**

This General Permit Registration Application shall be signed below by a Responsible Official. A Responsible Official is a President, Vice President, Secretary, Treasurer, General Partner, General Manager, a member of a Board of Directors, or Owner, depending on business structure. A business may certify an Authorized Representative who shall have authority to bind the Corporation, Partnership, Limited Liability Company, Association, Joint Venture or Sole Proprietorship. Required records of daily throughput, hours of operation and maintenance, general correspondence, Emission Inventory, Certified Emission Statement, compliance certifications and all required notifications must be signed by a Responsible Official or an Authorized Representative. If a business wishes to certify an Authorized Representative, the official agreement below shall be checked off and the appropriate names and signatures entered. Any administratively incomplete or improperly signed or unsigned Registration Application will be returned to the applicant.

FOR A CORPORATION (domestic or foreign)

I certify that I am a President, Vice President, Secretary, Treasurer or in charge of a principal business function of the corporation

FOR A PARTNERSHIP

I certify that I am a General Partner

FOR A LIMITED LIABILITY COMPANY

I certify that I am a General Partner or General Manager

FOR AN ASSOCIATION

I certify that I am the President or a member of the Board of Directors

FOR A JOINT VENTURE

I certify that I am the President, General Partner or General Manager

FOR A SOLE PROPRIETORSHIP

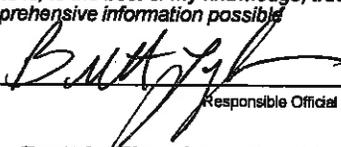
I certify that I am the Owner and Proprietor

I hereby certify that (please print or type) \_\_\_\_\_  
is an Authorized Representative and in that capacity shall represent the interest of the business (e.g., Corporation, Partnership, Limited Liability Company, Association Joint Venture or Sole Proprietorship) and may obligate and legally bind the business. If the business changes its Authorized Representative, a Responsible Official shall notify the Director of the Office of Air Quality immediately, and/or,

I hereby certify that all information contained in this General Permit Registration Application and any supporting documents appended hereto is, to the best of my knowledge, true, accurate and complete, and that all reasonable efforts have been made to provide the most comprehensive information possible

Signature

(please use blue ink)



Responsible Official

5/5/15

Date

Name & Title **Brett Loflin - Vice President Regulatory Affairs**

(please print or type)

Signature

(please use blue ink)

Authorized Representative (if applicable)

Date

Applicant's Name

Phone & Fax

304/241-5752

Phone

304/414-7061

Fax

Email

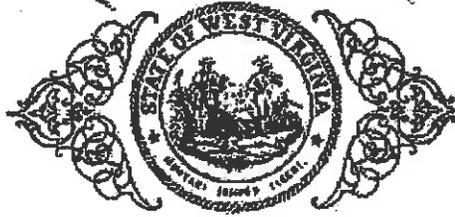
bloflin@nne-llc.com

---

**ATTACHMENT A**

**Business Registration**

# State of West Virginia



## Certificate

*I, Natalie E. Tennant, Secretary of State of the State of West Virginia, hereby certify that*

**NORTHEAST NATURAL ENERGY LLC**

Control Number: 99GX5

a limited liability company, organized under the laws of the State of Delaware has filed its "Application for Certificate of Authority" in my office according to the provisions of West Virginia Code §31B-10-1002. I hereby declare the organization to be registered as a foreign limited liability company from its effective date of October 9, 2009, until a certificate of cancellation is filed with our office.

Therefore, I hereby issue this

### **CERTIFICATE OF AUTHORITY OF A FOREIGN LIMITED LIABILITY COMPANY**

to the limited liability company authorizing it to transact business in West Virginia



*Given under my hand and the  
Great Seal of the State of  
West Virginia on this day of  
October 9, 2009*

*Natalie E. Tennant*

Secretary of State

Natalie E. Tennant  
Secretary of State  
State Capitol Building  
1900 Kanawha Blvd. East  
Charleston, WV 25305-0770

www.wvsos.com

WEST VIRGINIA  
APPLICATION FOR  
CERTIFICATE OF AUTHORITY  
OF LIMITED LIABILITY COMPANY

Penney Barker, Manager  
Corporations Division  
Tel: (304) 558-8000  
Fax: (304) 558-8381  
Hours: 8:30 a.m. - 5:00 p.m. ET

Control # 99GX5

**\*\*A certificate of existence from your home state of organization, dated during the current tax year, must be included with this application.\*\***

1. The name of the company as registered in its home state is: Northeast Natural Energy LLC  
and the state or country of organization is: Delaware

2. The name to be used in West Virginia will be:  
[The name must contain one of the required terms such as "limited liability company" or abbreviations such as L.L.C. or "P.L.L.C." See instructions for complete list of acceptable terms and requirements for use of trade name (DBA).]  
 Home state name as listed above, if available in W. Va.  
 DBA name \_\_\_\_\_

3. The company will be a: [See instructions for limitations on professions which may form P.L.L.C. in W.Va. All members must have WV professional license.]  
 regular L.L.C.  
 professional L.L.C. for the profession of \_\_\_\_\_

4. The address of the designated office of the company in WV, if any, will be: [need not be a place of the company's business]  
Street/Box: 707 Virginia Street, East Suite 1400  
City/State/Zip: Charleston, WV 25301

5. The street address of the principal office is:  
Street/Box: 707 Virginia Street, East Suite 1400  
City/State/Zip: Charleston, WV 25301

and the mailing address (if different) is:  
Street/Box: \_\_\_\_\_  
City/State/Zip: \_\_\_\_\_

6. The name and address of the initial agent of process, if any, is:  
Name: Jo Ellen Yeary  
Street: 707 Virginia Street, East Suite 1400  
City/State/Zip: Charleston, WV 25301

The mailing address of the above agent of process, if different, is:  
Street/Box: \_\_\_\_\_  
City/State/Zip: \_\_\_\_\_

7. The company is:  
 an at-will company, for an indefinite period.  
 a term company, for the term of \_\_\_\_\_ years,  
which will expire on \_\_\_\_\_

**FILED**

OCT 09 2009

IN THE OFFICE OF  
SECRETARY OF STATE

W. VA. APPLICATION FOR CERTIFICATE OF AUTHORITY OF LTD. LIABILITY CO.

8. The Company is:

- member-managed. [List the names and addresses of all members who have signature authority, attach extra page if needed]
- manager-managed. [List the names and addresses of all managers who have signature authority, attach extra page if needed]

Name

Jo Ellen Yeary \_\_\_\_\_

Mark A. Williams \_\_\_\_\_

Address

707 Virginia Street, East, Suite 1400, Charleston, WV 25301 \_\_\_\_\_

707 Virginia Street, East, Suite 1400, Charleston, WV 25301 \_\_\_\_\_

9. All or specified members of a limited liability company are liable in their capacity as members for all or specified debts, obligations or liabilities of the company.

- NO -- All debts, obligations and liabilities are those of the company.
- YES -- Those persons who are liable in their capacity as members for all debts, obligations or liability of the company have consented in writing to the adoption of the provision or to be bound by the provision.

10. The purpose for which this limited liability company is formed are as follows:  
(Describe the type(s) of business activity which will be conducted, for example, "real estate," "construction of residential and commercial buildings," "commercial printing," "professional practice of architecture.")

Energy

11. The number of pages attached and included in this application is zero.

12. The requested date for the establishment of the limited liability company in West Virginia is:

- the date & time of filing
- the following date \_\_\_\_\_ and time \_\_\_\_\_  
[Requested date may not be earlier than filing nor later than 90 days after filing.]

13. Enter the number of acres the company desires to hold in West Virginia. If your company holds more than 10,000 acres of land, you must submit a fee of 5¢ for each acre over 10,000. *none currently owned and amount to be owned is unknown*

14. Contact and Signature Information:

a. Contact person to reach in case there is a problem with filing: Mark D. Clark

Phone # (304) 340-3876

b. Signature of manager of a manager-managed company, member of a member-managed company, person organizing the company, if the company has not been formed or attorney-in-fact for any of the above

Jo Ellen Yeary  
Name [print or type]

Member  
Title/Capacity

Jo Ellen Yeary  
Signature

# Delaware

PAGE 1

*The First State*

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "NORTHEAST NATURAL ENERGY LLC" IS DULY FORMED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE NINTH DAY OF OCTOBER, A.D. 2009.

AND I DO HEREBY FURTHER CERTIFY THAT THE SAID "NORTHEAST NATURAL ENERGY LLC" WAS FORMED ON THE SEVENTEENTH DAY OF SEPTEMBER, A.D. 2009.

AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL TAXES HAVE NOT BEEN ASSESSED TO DATE.

4713590 8300

090925479

You may verify this certificate online  
at [corp.delaware.gov/authver.shtml](http://corp.delaware.gov/authver.shtml)



  
Jeffrey W. Bullock, Secretary of State  
AUTHENTICATION: 7576152

DATE: 10-09-09

---

# **ATTACHMENT B**

## **Process Description**

**Northeast Natural Energy, LLC**  
**Yost Well Pad**  
**Attachment B**  
**Process Description**

Natural gas and Produced Fluids (water) is received from three wells on this location at approximately 600 psi and passed through Gas Processing Units (one per well) to avoid ice and methane hydrate formation during subsequent pressure drops. These materials will then pass through a separator where gas and water are separated. The gas will be routed to a gathering pipeline owned and operated by others.

The Produced Water will be accumulated in two 400 and one 210 BBL tanks, pending truck transportation by others. Produced water will be re-used at subsequent wells or disposed of at a regional disposal facility. Flash, working and breathing losses from these tanks have been determined to be nominal, based on measurements at a nearby Northeast Energy Well Pad, and will be allowed to vent to atmosphere. *There is no condensate generated at this facility.*

A Process Flow Diagram depicting these features is provided in Attachment D.

There will be a single gas-fired compressor engine used to boost the pressure of the production gas to a pressure suitable for injection into the gathering line owned by others. No dehydration units are proposed for this facility. It is important to note that this compressor and engine are anticipated to operate only for a limited time period (approximately 12-18 months) pending construction and operation of a compressor station by the company providing midstream services for Northeast Energy.

All natural gas fired equipment (GPUs and the compressor engine) use natural gas produced at the site as fuel.

40 CFR 60, Subpart OOOO requires that VOC emissions from each "storage vessel affected facility" installed after April 12, 2013 (GROUP 2) must be controlled by at least 95% by April 15, 2014 or within 60 days of installation when the VOC uncontrolled emissions exceed 6 tpy. VOC emissions from the tanks described above will be well below the 6 tpy limit. Thus, the tanks at this facility will not be regulated under 40 CFR 60, Subpart OOOO.

**Emission Units Table**  
 (includes all emission units and air pollution control devices  
 that will be part of this permit application review, regardless of permitting status)

Emission Unit ID <sup>1</sup>	Emission Point ID <sup>2</sup>	Emission Unit Description	Year Installed/Modified	Design Capacity	Type <sup>3</sup> and Date of Change	Control Device <sup>4</sup>
HTR-1	1E	Gas Processing Unit	Pending Permit	1.0 MMBTU/Hr	NEW	None
HTR-2	2E	Gas Processing Unit	Pending Permit	1.0 MMBTU/Hr	NEW	None
HTR-3	3E	Gas Processing Unit	Pending Permit	1.0 MMBTU/Hr	NEW	None
CE-1	4E	CAT 3516B	Pending Permit	1380 HP	NEW	1C
T01	5E	Produced Water Tank	Pending Permit	210 BBL	NEW	None
T02	6E	Produced Water Tank	Pending Permit	400 BBL	NEW	None
T03	7E	Produced Water Tank	Pending Permit	400 BBL	NEW	None
TL-1	8E	Produced Water Loading	Pending Permit	175,200 BBL/Yr.	NEW	None

<sup>1</sup> For Emission Units (or Sources) use the following numbering system: 1S, 2S, 3S,... or other appropriate designation.  
<sup>2</sup> For Emission Points use the following numbering system: 1E, 2E, 3E, ... or other appropriate designation.  
<sup>3</sup> New, modification, removal  
<sup>4</sup> For Control Devices use the following numbering system: 1C, 2C, 3C,... or other appropriate designation.

---

**ATTACHMENT C**

**Description of Fugitive Emissions**

**Northeast Natural Energy, LLC**  
**Yost Well Pad**  
**Attachment C – Fugitive Emissions Data**

**Storage Tank and Haul Road Fugitive Emissions**

Haul Road Fugitive Emissions for unpaved roads are calculated and presented in Attachment I. PM is estimated to be 7.57 tons per year and PM-10 to be 1.02 tons per year.

Produced Fluids received by this facility is accumulated in a three tanks prior to off-site shipment. Emissions from these tanks were determined by using direct measurements from produced water tanks at a nearby Northeast well pad. Uncontrolled emissions from these tanks were determined to be 0.19 tons per year of VOCs. There is no control on these emissions. *There is no condensate at this facility.*

Emissions from these sources are summarized in the following fugitive emissions form and the calculations are included in the emissions summary in Attachment I.

**Equipment Fugitive Emissions**

As noted in the process description, Northeast plans to install various equipment at its Yost Well Pad. This equipment will contain a variety of piping containing natural gas and separated liquids under pressure. During the normal course of operation minor leaks from valves, pressure release devices and various fittings associated with this piping may occur. A potential emission rate of less than 0.01 tpy of VOCs and 25.8 tpy CO<sub>2e</sub> has been estimated.

Estimates of these emissions are included in the calculations (Attachment I) and summarized on the form included in this section. These calculations are based on emission factors accepted by the American Petroleum Institute and EPA.

**Pigging Emission Estimates**

There will be no pigging operations under Northeast Natural Energy ownership/operation in association with this planned facility modification.

**Facility Blowdown Emission Estimates**

There will be one gas compressors at this facility that will require blowdowns to allow for routine maintenance. The volume of natural gas released per blowdown event from this unit and associated inlet separator and piping is approximately 1570 cubic feet of gas at STP (see attached calculations). There will be a maximum of 24 blow downs per compressor per year. Thus, there is a potential for 37,680 cubic feet of gas emitted from blowdowns per year.

The density of this gas at STP is 0.046 pounds per cubic foot (see the Inlet Gas spreadsheet in the calculations). Thus, the mass of gas released per year is 1,733 pounds (37,680 cf x 0.046). As the percentage of VOCs in the gas (by weight) is 0.68 percent (see Inlet Gas spreadsheet in the calculations), the VOC (non-methane/non-ethane) emissions from blowdown operations are estimated at approximately 12.0 lbs (1,733 x 0.0068) or less than 0.006 tons per year. As the methane concentration in this gas is 93.1 % (by weight), methane emissions will be 1,613 pounds (1,733 x 0.931) per year. Using a GHG factor of 25, methane emissions from blowdowns in CO<sub>2e</sub> will be 20 tons CO<sub>2e</sub> (1,613 x 25[GHG factor] /2000).

## FUGITIVE EMISSIONS DATA SUMMARY SHEET

The FUGITIVE EMISSIONS SUMMARY SHEET provides a summation of fugitive emissions. Fugitive emissions are those emissions which could not reasonably pass through a stack, chimney, vent or other functionally equivalent opening. Note that uncaptured process emissions are not typically considered to be fugitive, and must be accounted for on the appropriate EMISSIONS UNIT DATA SHEET and on the EMISSION POINTS DATA SUMMARY SHEET.

Please note that total emissions from the source are equal to all vented emissions, all fugitive emissions, plus all other emissions (e.g. uncaptured emissions).

### APPLICATION FORMS CHECKLIST - FUGITIVE EMISSIONS

1.) Will there be haul road activities?

Yes       No

If YES, then complete the HAUL ROAD EMISSIONS UNIT DATA SHEET.

2.) Will there be Storage Piles?

Yes       No

If YES, complete Table 1 of the NONMETALLIC MINERALS PROCESSING EMISSIONS UNIT DATA SHEET.

3.) Will there be Liquid Loading/Unloading Operations?

Yes       No

If YES, complete the BULK LIQUID TRANSFER OPERATIONS EMISSIONS UNIT DATA SHEET.

4.) Will there be emissions of air pollutants from Wastewater Treatment Evaporation?

Yes       No

If YES, complete the GENERAL EMISSIONS UNIT DATA SHEET.

5.) Will there be Equipment Leaks (e.g. leaks from pumps, compressors, in-line process valves, pressure relief devices, open-ended valves, sampling connections, flanges, agitators, cooling towers, etc.)?

Yes       No

If YES, complete the LEAK SOURCE DATA SHEET section of the CHEMICAL PROCESSES EMISSIONS UNIT DATA SHEET.

6.) Will there be General Clean-up VOC Operations?

Yes       No

If YES, complete the GENERAL EMISSIONS UNIT DATA SHEET.

7.) Will there be any other activities that generate fugitive emissions?

Yes       No

If YES, complete the GENERAL EMISSIONS UNIT DATA SHEET or the most appropriate form.

If you answered "NO" to all of the items above, it is not necessary to complete the following table, "Fugitive Emissions Summary."

FUGITIVE EMISSIONS SUMMARY		All Regulated Pollutants - Chemical Name/CAS <sup>1</sup>	Maximum Potential Uncontrolled Emissions <sup>2</sup>		Maximum Potential Controlled Emissions <sup>3</sup>		Est. Method Used <sup>4</sup>
			lb/hr	ton/yr	lb/hr	ton/yr	
Haul Road/Road Dust Emissions Paved Haul Roads							
Unpaved Haul Roads		PM	3.91	2.19	3.91	2.19	EE
		PM-10	0.53	0.29	0.53	0.29	EE
Loading and Unloading Produced Water		VOCs	NA	<0.01	NA	<0.01	EE
Equipment Leaks		VOCs	Does Not Apply	<0.01	Does Not Apply	<0.01	EE
		CO2e	Does Not Apply	25.8	Does Not Apply	25.8	EE
Blowdowns		VOCs	N/A	<0.01	N/A	<0.01	EE
		CO2e	N/A	20	N/A	20	EE
Other:							

<sup>1</sup> List all regulated air pollutants. Speciate VOCs, including all HAPs. Follow chemical name with Chemical Abstracts Service (CAS) number. LIST Acids, CO, CS<sub>2</sub>, VOCs, H<sub>2</sub>S, Inorganics, Lead, Organics, O<sub>3</sub>, NO, NO<sub>2</sub>, SO<sub>2</sub>, SO<sub>3</sub>, all applicable Greenhouse Gases (including CO<sub>2</sub> and methane), etc. DO NOT LIST H<sub>2</sub>, H<sub>2</sub>O, N<sub>2</sub>, O<sub>2</sub>, and Noble Gases.

<sup>2</sup> Give rate with no control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).

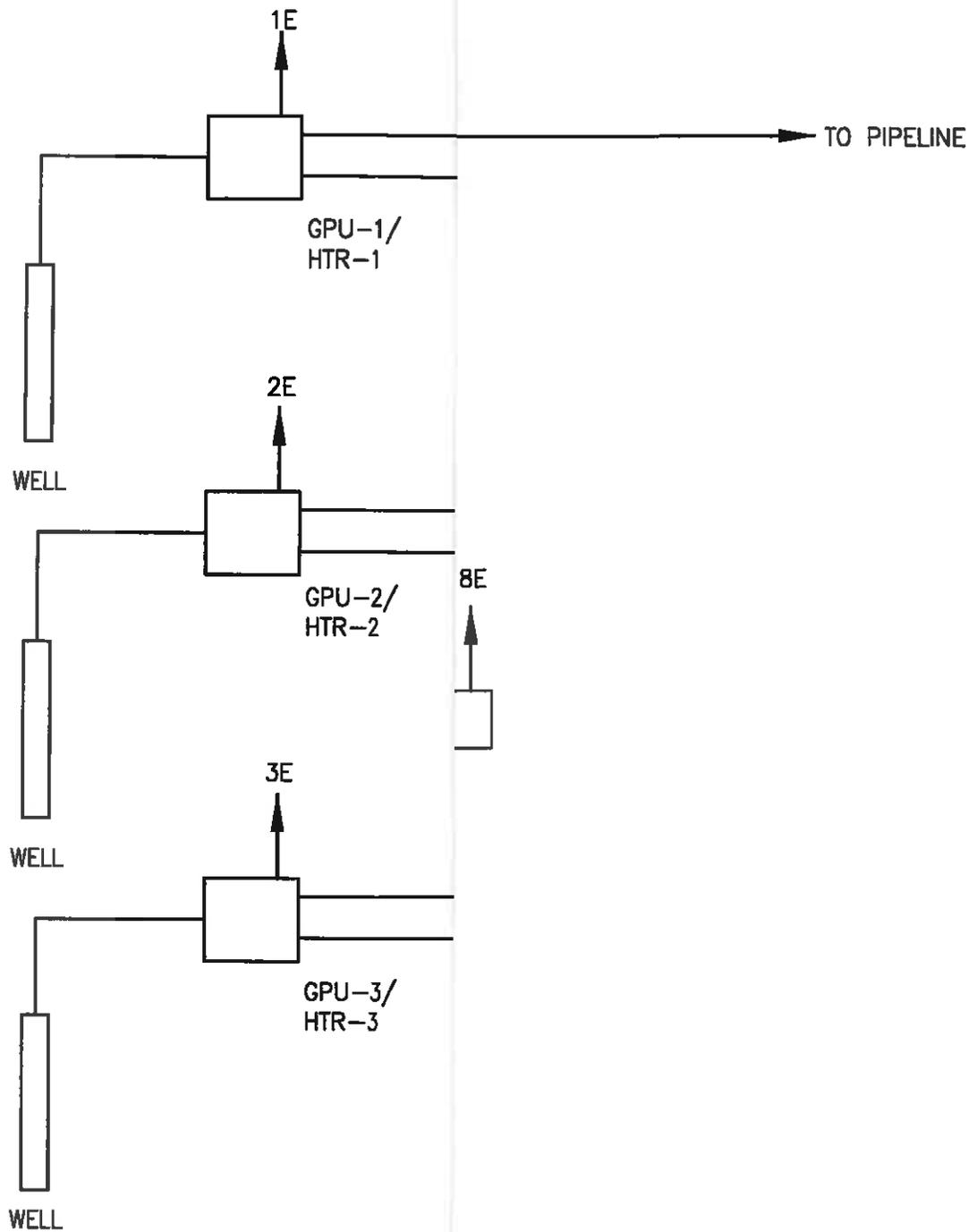
<sup>3</sup> Give rate with proposed control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).

<sup>4</sup> Indicate method used to determine emission rate as follows: MB = material balance; ST = stack test (give date of test); EE = engineering estimate; O = other (specify).

---

**ATTACHMENT D**

**Process Flow Diagram**



NORTHEAST NATIONAL ENERGY, LLC

YOST WELL PAD  
 MONONGALIA COUNTY, WEST VIRGINIA  
 PROCESS FLOW DIAGRAM

DRAWING NAME

FIGURE 2

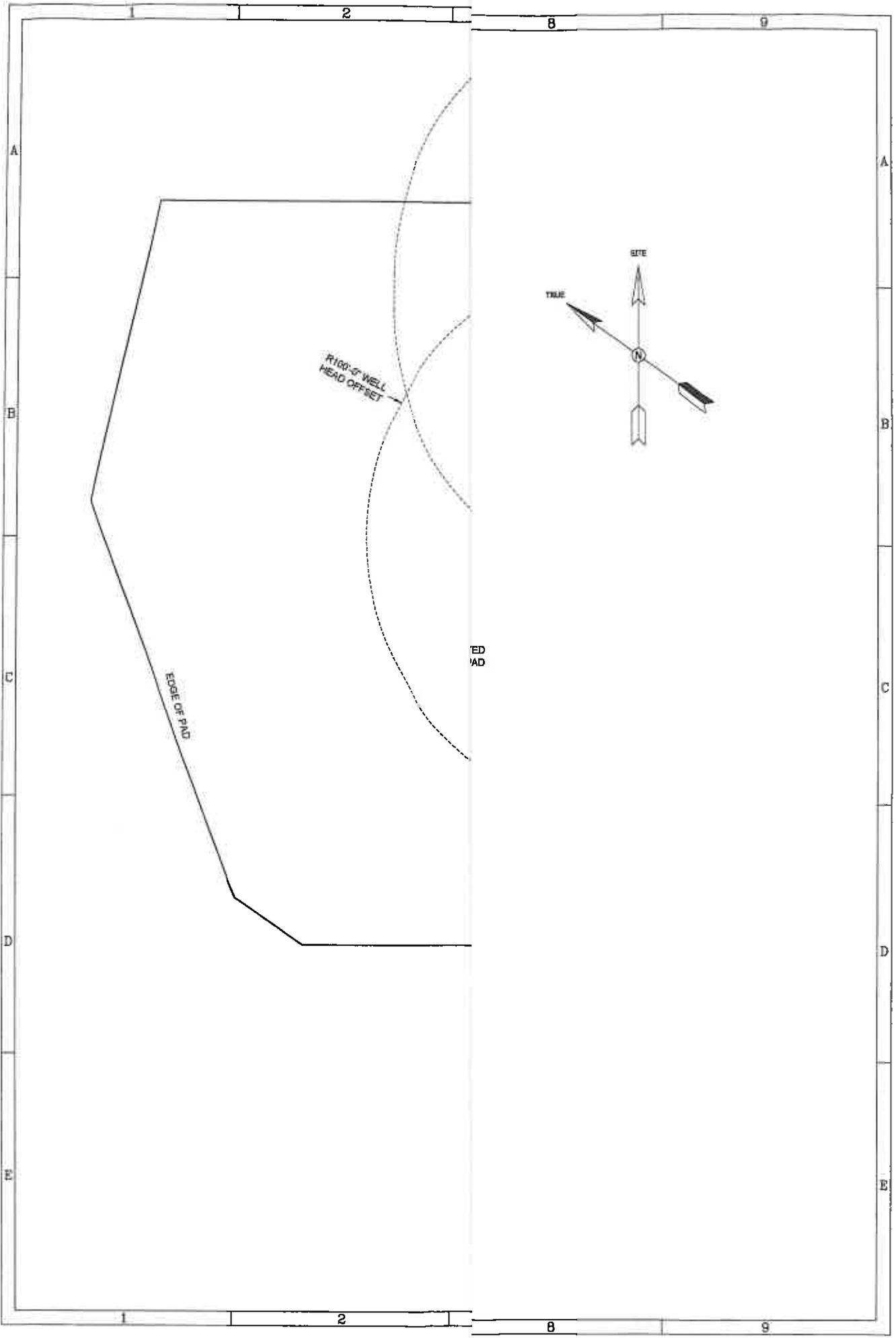
REV.

0

---

**ATTACHMENT E**

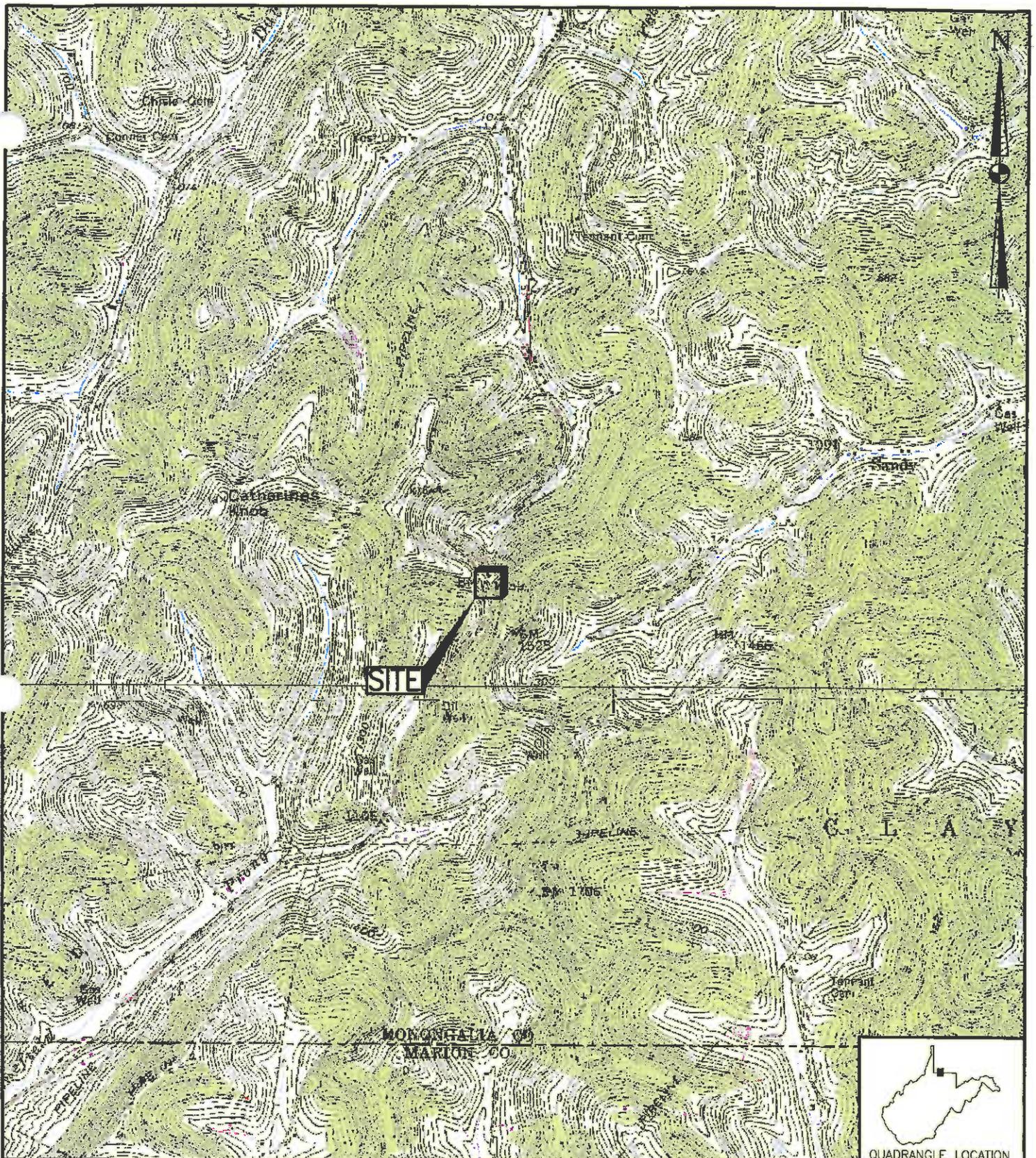
**Plot Plan**



---

# **ATTACHMENT F**

## **Area Map**



REFERENCE: USGS 7.5' QUADRANGLE MAP OF: BLACKSVILLE, WEST VIRGINIA; DATED 1958, PHOTOREVISED 1976, PHOTOINSPECTED 1988.

DRAWN BY	DJF
DATE	4/28/15
CHECKED BY	RAD
SET JOB NO.	215031
SET DWG FILE	YOSTm01.dwg
DRAWING SCALE	1" = 2000'



98 Vanadium Road Bridgeville, PA 15017 (412) 221-1100

NORTHEAST NATIONAL ENERGY, LLC

YOST WELL PAD  
MONONGALIA COUNTY, WEST VIRGINIA  
SITE LOCATION MAP

DRAWING NO.

FIGURE 1

REV.

0

---

**ATTACHMENT G**

**Equipment Data Sheets and  
Registration Section Applicability Form**

## General Permit G70-A Registration Section Applicability Form

General Permit G70-A was developed to allow qualified applicants to seek registration for a variety of sources. These sources include natural gas well affected facilities, storage tanks, natural gas-fired compressor engines (RICE), natural gas producing units, natural gas-fired in-line heaters, pneumatic controllers, heater treaters, tank truck loading, glycol dehydration units, completion combustion devices, flares, enclosed combustion devices, and vapor recovery systems. All registered facilities will be subject to Sections 1.0, 2.0, 3.0, and 4.0.

General Permit G70-A allows the registrant to choose which sections of the permit they are seeking registration under. Therefore, please mark which additional sections that you are applying for registration under. If the applicant is seeking registration under multiple sections, please select all that apply. Please keep in mind, that if this registration is approved, the issued registration will state which sections will apply to your affected facility.

Section 5	Natural Gas Well Affected Facility	<input checked="" type="checkbox"/>
Section 6	Storage Vessels*	<input checked="" type="checkbox"/>
Section 7	Gas Producing Units, In-Line Heaters, Heater Treaters, and Glycol Dehydration Reboilers	<input checked="" type="checkbox"/>
Section 8	Pneumatic Controllers Affected Facility(NSPS, Subpart OOOO)	<input type="checkbox"/>
Section 9	<i>Reserved</i>	<input type="checkbox"/>
Section 10	Natural gas-fired Compressor Engine(s) (RICE)**	<input checked="" type="checkbox"/>
Section 11	Tank Truck Loading Facility ***	<input checked="" type="checkbox"/>
Section 12	Standards of Performance for Storage Vessel Affected Facilities (NSPS, Subpart OOOO)	<input type="checkbox"/>
Section 13	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (NSPS, Subpart JJJJ)	<input checked="" type="checkbox"/>
Section 14	Control Devices not subject to NSPS, Subpart OOOO	<input checked="" type="checkbox"/>
Section 15	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40CFR63, Subpart ZZZZ)	<input type="checkbox"/>
Section 16	Glycol Dehydration Units	<input type="checkbox"/>
Section 17	Dehydration Units With Exemption from NESHAP Standard, Subpart HH § 63.764(d) (40CFR63, Subpart HH)	<input type="checkbox"/>
Section 18	Dehydration Units Subject to NESHAP Standard, Subpart HH and Not Located Within an UA/UC (40CFR63, Subpart HH)	<input type="checkbox"/>
Section 19	Dehydration Units Subject to NESHAP Standard, Subpart HH and Located Within an UA/UC (40CFR63, Subpart HH)	<input type="checkbox"/>

\* Applicants that are subject to Section 6 may also be subject to Section 12 if the applicant is subject to the NSPS, Subpart OOOO control requirements or the applicable control device requirements of Section 14.

\*\* Applicants that are subject to Section 10 may also be subject to the applicable RICE requirements of Section 13 and/or Section 15.

\*\*\* Applicants that are subject to Section 11 may also be subject to control device requirements of Section 14.

## NATURAL GAS WELL AFFECTED FACILITY DATA SHEET

*Complete this data sheet if you are the owner or operator of a gas well affected facility for which construction, modification, or reconstruction commenced after August 23, 2011. This form must be completed for natural gas well affected facilities regardless of when flowback operations occur (or have occurred).*

Please provide the API number(s) for each NG well at this facility:	
047-061-01670	
047-061-01671	
047-061-01673	

*Note: This is the same API well number(s) provided in the well completion notification and as provided to the WVDEP, Office of Oil and Gas for the well permit. The API number may be provided on the application without the state code (047).*

*Every oil and gas well permitted in West Virginia since 1929 has been issued an API (American Petroleum Institute) number. This API is used by agencies to identify and track oil and gas wells.*

*The API number has the following format: 047-001-00001*

*Where,*

*047 = State code. The state code for WV is 047.*

*001 = County Code. County codes are odd numbers, beginning with 001 (Barbour) and continuing to 109 (Wyoming).*

*00001 = Well number. Each well will have a unique well number.*



## NATURAL GAS COMPRESSOR/GENERATOR ENGINE DATA SHEET

Source Identification Number <sup>1</sup>		CE-1					
Engine Manufacturer and Model		Caterpillar 3516					
Manufacturer's Rated bhp/rpm		1380 @ 1400					
Source Status <sup>2</sup>		NS					
Date Installed/Modified/Removed <sup>3</sup>		Upon Receipt of Permit					
Engine Manufactured/Reconstruction Date <sup>4</sup>		6/27/2013					
Is this a Certified Stationary Spark Ignition Engine according to 40CFR60 Subpart JJJJ? (Yes or No) <sup>5</sup>		No					
Engine, Fuel and Combustion Data	Engine Type <sup>6</sup>	LB4S					
	APCD Type <sup>7</sup>	CAT					
	Fuel Type <sup>8</sup>	RG					
	H <sub>2</sub> S (gr/100 scf)	<1					
	Operating bhp/rpm	1380 @ 1400					
	BSFC (Btu/bhp-hr)	8255					
	Fuel throughput (ft <sup>3</sup> /hr)	11,028					
	Fuel throughput (MMft <sup>3</sup> /yr)	96.61					
Operation (hrs/yr)	8760						
Reference <sup>9</sup>	Potential Emissions <sup>10</sup>	lbs/hr	tons/yr	lbs/hr	tons/yr	lbs/hr	tons/yr
AP	NO <sub>x</sub>	1.52	6.66				
AP	CO	0.52	2.27				
AP	VOC	0.73	3.20				
AP	SO <sub>2</sub>	<0.01	0.03				
AP	PM <sub>10</sub>	0.11	0.50				
AP	Formaldehyde	0.13	0.57				
AP	Total HAPs	0.29	1.27				
AP	CO <sub>2e</sub>	1744	7639				

1. Enter the appropriate Source Identification Number for each natural gas-fueled reciprocating internal combustion compressor/generator engine located at the compressor station. Multiple compressor engines should be designated CE-1, CE-2, CE-3 etc. Generator engines should be designated GE-1, GE-2, GE-3 etc. If more than three (3) engines exist, please use additional sheets.

2. Enter the Source Status using the following codes:

NS Construction of New Source (installation)  
MS Modification of Existing Source

ES Existing Source  
RS Removal of Source

3. Enter the date (or anticipated date) of the engine's installation (construction of source), modification or removal.
4. Enter the date that the engine was manufactured, modified or reconstructed.
5. Is the engine a certified stationary spark ignition internal combustion engine according to 40CFR60 Subpart JJJJ. If so, the engine and control device must be operated and maintained in accordance with the manufacturer's emission-related written instructions. You must keep records of conducted maintenance to demonstrate compliance, but no performance testing is required. If the certified engine is not operated and maintained in accordance with the manufacturer's emission-related written instructions, the engine will be considered a non-certified engine and you must demonstrate compliance according to 40CFR§60.4243a(2)(i) through (iii), as appropriate.

**Provide a manufacturer's data sheet for all engines being registered.**

6. Enter the Engine Type designation(s) using the following codes:

LB2S	Lean Burn Two Stroke	RB4S	Rich Burn Four Stroke
LB4S	Lean Burn Four Stroke		

7. Enter the Air Pollution Control Device (APCD) type designation(s) using the following codes:

A/F	Air/Fuel Ratio	IR	Ignition Retard
HEIS	High Energy Ignition System	SIPC	Screw-in Precombustion Chambers
PSC	Prestratified Charge	LEC	Low Emission Combustion
NSCR	Rich Burn & Non-Selective Catalytic Reduction	SCR	Lean Burn & Selective Catalytic Reduction

8. Enter the Fuel Type using the following codes:

PQ	Pipeline Quality Natural Gas	RG	Raw Natural Gas
----	------------------------------	----	-----------------

9. Enter the Potential Emissions Data Reference designation using the following codes. Attach all referenced data to this *Compressor/Generator Data Sheet(s)*.

MD	Manufacturer's Data	AP	AP-42	
GR	GRI-HAPCalc™	OT	Other _____	(please list)

10. Enter each engine's Potential to Emit (PTE) for the listed regulated pollutants in pounds per hour and tons per year. PTE shall be calculated at manufacturer's rated brake horsepower and may reflect reduction efficiencies of listed Air Pollution Control Devices. Emergency generator engines may use 500 hours of operation when calculating PTE. PTE data from this data sheet shall be incorporated in the *Emissions Summary Sheet*.

---

**ATTACHMENT H**

**Air Pollution Control Device Sheets**



### USA Unit 1399 G3516BLE Engine Emissions

Date of Manufacture	<u>June 27, 2013</u>	Engine Serial Number	<u>JEF02325</u>	Date Modified/Reconstructed	<u>TBD</u>
Driver Rated HP	<u>1380</u>	Rated Speed in RPM	<u>1400</u>	Combustion Type	<u>Spark Ignited 4 Stroke</u>
Number of Cylinders	<u>16</u>	Compression Ratio	<u>8:1</u>	Combustion Setting	<u>Ultra Lean Burn</u>
Total Displacement (in <sup>3</sup> )	<u>4230</u>	Fuel Delivery Method	<u>Carburetor</u>	Combustion Air Treatment	<u>T.C./Aftercooled</u>

#### Raw Engine Emissions (With Customer Fuel Gas with little to no H2S)

<i>Fuel Consumption</i>	<i>7442 LHV BTU/bhp-hr or</i>	<i>8255 HHV BTU/bhp-hr</i>		
<i>Altitude</i>	<i>1200 ft</i>			
<i>Maximum Air Inlet Temp</i>	<i>90 F</i>			

	<u>g/bhp-hr<sup>1</sup></u>	<u>lb/MMBTU<sup>2</sup></u>	<u>lb/hr</u>	<u>TPY</u>
Nitrogen Oxides (NOx)	0.5		1.52	6.66
Carbon Monoxide (CO)	2.43		7.39	32.38
Volatile Organic Compounds (VOC or NMNEHC excluding CH2O)	0.48		1.46	6.40
Formaldehyde (CH2O)	0.43		1.31	5.73
Particulate Matter (PM) <small>Filterable+Condensable</small>		9.99E-03	1.14E-01	4.98E-01
Sulfur Dioxide (SO2)		5.88E-04	6.70E-03	2.93E-02

	<u>g/bhp-hr<sup>1</sup></u>	<u>lb/hr</u>	<u>Metric Tonne/yr</u>
Carbon Dioxide (CO2)	472	1436	5705
Methane (CH4)	4.04	12.29	48.83

<sup>1</sup> g/bhp-hr are based on Caterpillar Specifications (GERP) assuming customer fuel gas, 1200 ft elevation, and 90 F Max Air Inlet Temperature. Note that g/bhp-hr values are based on 100% Load Operation. For Air Permitting, it is recommended to add a safety margin to CO, VOC, and formaldehyde to account for variations in fuel gas composition and load.

<sup>2</sup> Emission Factor obtained from EPA's AP-42, Fifth Edition, Volume I, Chapter 3: Stationary Internal Combustion Sources (Section 3.2 Natural Gas-Fired Reciprocating Engines, Table 3.2-2).

#### Catalytic Converter Emissions

*Catalytic Converter Make and Model:* DCL, 2DC65-14  
*Element Type:* Oxidation, 30.75" Round  
*Number of Elements in Housing:* (2) Full Elements  
*Air/Fuel Ratio Control:* Caterpillar ADEM3, NOx Feedback

	<u>% Reduction</u>	<u>lb/hr</u>	<u>TPY</u>
Nitrogen Oxides (NOx)	0	1.52	6.66
Carbon Monoxide (CO)	93	0.52	2.27
Volatile Organic Compounds (VOC or NMNEHC)	50 (use 30% DRE for High BTU Fuels)	0.73	3.20
Formaldehyde (CH2O)	90	0.13	0.57
Particulate Matter (PM)	0	1.14E-01	4.98E-01
Sulfur Dioxide (SO2)	0	6.70E-03	2.93E-02

	<u>% Reduction</u>	<u>lb/hr</u>	<u>Metric Tonne/yr</u>
Carbon Dioxide (CO2)	0	1436	5705
Methane (CH4)	0	12.29	48.83



1610 Woodstead Ct, Suite 245, The Woodlands, Texas 77380 USA  
 Tel: 877-965-8939 Fax: 281-605-5858 info@dcl-inc.com www.dcl-inc.com

**GLOBAL LEADER IN EMISSION CONTROL SOLUTIONS**

<b>To:</b>	Chris Magee	<b>Phone:</b>	814-746-6942
<b>Company:</b>	USA Compression	<b>Email:</b>	CMagee@usacompression.com
<b>Date:</b>	March 20, 2015	<b>No. Pages:</b>	1

Dear Chris,

We hereby guarantee that our Model DC65-14 specified below with one (2) elements installed as described below, and sized for the following engine:

Engine Data	
Engine Model	Caterpillar G3516B
Power	1380HP
Fuel	PQNG
Exhaust Flow Rate	9127 acfm
Exhaust Temperature	994°F

Catalyst Data	
Catalyst Model	DC65-14
Type	Oxidation- A
# of Elements	2
Cell Density	300 cpsi
Approx Dimensions	See attached drawing
Approx Pressure Drop	4.0" w.c

will perform as follows:

Exhaust Component	Engine Output g/bhp-hr or % reduction	Converter Output g/bhp-hr or % reduction
CO	2.43	93
VOC	0.48	0.25
CH20	0.43	0.05

for a period of 1 year or 8000 hours, whichever comes first, subject to all terms and conditions contained in the attached warranty document being respected and met.

Best Regards,

On behalf of DCL America Inc.

**Lisa Barber**

416-788-8021  
[lbarber@dcl-inc.com](mailto:lbarber@dcl-inc.com)

# G3516B

GAS COMPRESSION APPLICATION

## GAS ENGINE SITE SPECIFIC TECHNICAL DATA Northeast Quote 4-10-15



ENGINE SPEED (rpm): 1400  
 COMPRESSION RATIO: 8:1  
 AFTERCOOLER TYPE: SCAC  
 AFTERCOOLER - STAGE 2 INLET (°F): 130  
 AFTERCOOLER - STAGE 1 INLET (°F): 201  
 JACKET WATER OUTLET (°F): 210  
 ASPIRATION: TA  
 COOLING SYSTEM: JW+OC+1AC, 2AC  
 CONTROL SYSTEM: ADEM3  
 EXHAUST MANIFOLD: DRY  
 COMBUSTION: LOW EMISSION  
 NOx EMISSION LEVEL (g/bhp-hr NOx): 0.5  
 SET POINT TIMING: 30

RATING STRATEGY: STANDARD  
 RATING LEVEL: CONTINUOUS  
 FUEL SYSTEM: CAT WIDE RANGE  
 WITH AIR FUEL RATIO CONTROL

**SITE CONDITIONS:**  
 FUEL: Northeast 4-10-15  
 FUEL PRESSURE RANGE(psig): 7.0-40.0  
 FUEL METHANE NUMBER: 90.5  
 FUEL LHV (Btu/scf): 931  
 ALTITUDE(ft): 1200  
 MAXIMUM INLET AIR TEMPERATURE(°F): 90  
 STANDARD RATED POWER: 1380 bhp@1400rpm

RATING	NOTES	LOAD	SITE RATING AT MAXIMUM INLET AIR TEMPERATURE			
			100%	100%	75%	50%
ENGINE POWER (WITHOUT FAN)	(1)	bhp	1380	1380	1035	690
INLET AIR TEMPERATURE		°F	90	90	90	90

ENGINE DATA						
FUEL CONSUMPTION (LHV)	(2)	Btu/bhp-hr	7442	7442	7971	8561
FUEL CONSUMPTION (HHV)	(2)	Btu/bhp-hr	8255	8255	8842	9497
AIR FLOW (@inlet air temp, 14.7 psia)	(3)(4) (WET)	ft <sup>3</sup> /min	3199	3202	2511	1756
AIR FLOW	(3)(4) (WET)	lb/hr	13860	13860	10873	7601
FUEL FLOW (80°F, 14.7 psia)		scfm	184	184	148	106
INLET MANIFOLD PRESSURE	(5)	in Hg(abs)	94.6	94.6	76.8	54.0
EXHAUST TEMPERATURE - ENGINE OUTLET	(6)	°F	992	992	986	1006
EXHAUST GAS FLOW (@engine outlet temp, 14.5 psia)	(7)(4) (WET)	ft <sup>3</sup> /min	9106	9106	7122	5053
EXHAUST GAS MASS FLOW	(7)(4) (WET)	lb/hr	14341	14341	11259	7678

EMISSIONS DATA - ENGINE OUT						
NOx (as NO2)	(8)(9)	g/bhp-hr	0.50	0.50	0.50	0.50
CO	(8)(9)	g/bhp-hr	2.43	2.43	2.60	2.55
THC (mol. wt. of 15.84)	(8)(9)	g/bhp-hr	4.75	4.75	5.09	5.17
NMHC (mol. wt. of 15.84)	(8)(9)	g/bhp-hr	0.71	0.71	0.76	0.78
NMNEHC (VOCs) (mol. wt. of 15.84)	(8)(9)(10)	g/bhp-hr	0.48	0.48	0.51	0.52
HCHO (Formaldehyde)	(8)(9)	g/bhp-hr	0.43	0.43	0.43	0.42
CO2	(8)(9)	g/bhp-hr	472	472	504	548
EXHAUST OXYGEN	(8)(11)	% DRY	9.0	9.0	8.7	8.3

HEAT REJECTION						
HEAT REJ. TO JACKET WATER (JW)	(12)	Btu/min	23610	23610	21688	20035
HEAT REJ. TO ATMOSPHERE	(12)	Btu/min	6110	6110	5092	4074
HEAT REJ. TO LUBE OIL (OC)	(12)	Btu/min	4475	4475	3978	3363
HEAT REJ. TO A/C - STAGE 1 (1AC)	(12)(13)	Btu/min	11577	11577	9642	3428
HEAT REJ. TO A/C - STAGE 2 (2AC)	(12)(13)	Btu/min	5517	5517	5202	3396

COOLING SYSTEM SIZING CRITERIA			
TOTAL JACKET WATER CIRCUIT (JW+OC+1AC)	(13)(14)	Btu/min	43496
TOTAL AFTERCOOLER CIRCUIT (2AC)	(13)(14)	Btu/min	5793

A cooling system safety factor of 0% has been added to the cooling system sizing criteria.

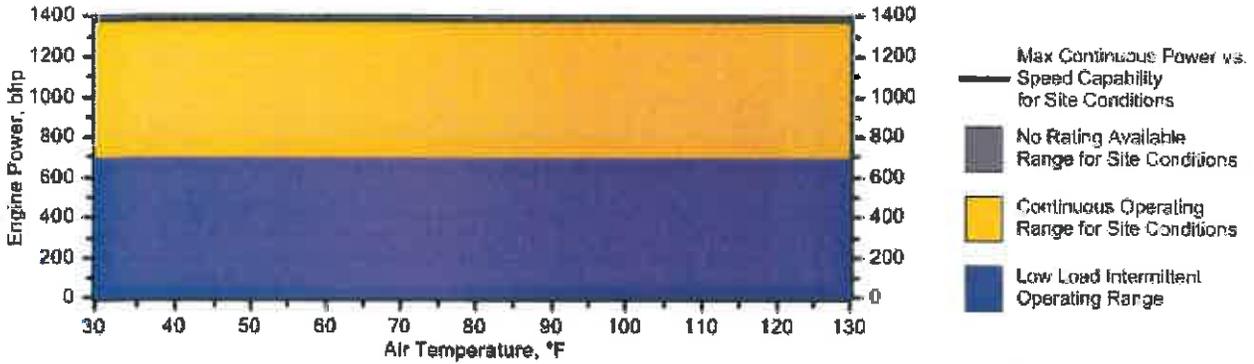
**CONDITIONS AND DEFINITIONS**

Engine rating obtained and presented in accordance with ISO 3048/1, adjusted for fuel, site altitude and site inlet air temperature. 100% rating at maximum inlet air temperature is the maximum engine capability for the specified fuel at site altitude and maximum site inlet air temperature. Maximum rating is the maximum capability at the specified aftercooler inlet temperature for the specified fuel at site altitude and reduced inlet air temperature. Lowest load point is the lowest continuous duty operating load allowed. No overload permitted at rating shown.

For notes information consult page three.

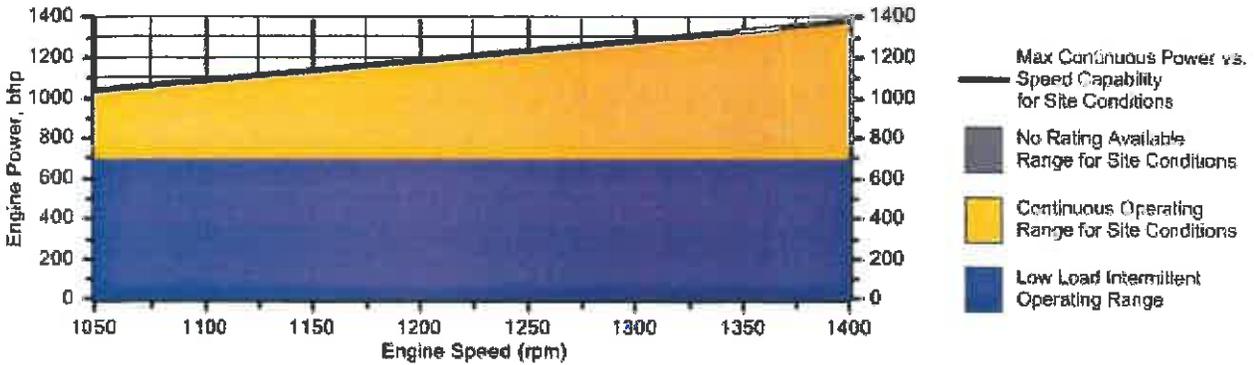
**Engine Power vs. Inlet Air Temperature**

Data represents temperature sweep at 1200 ft and 1400 rpm



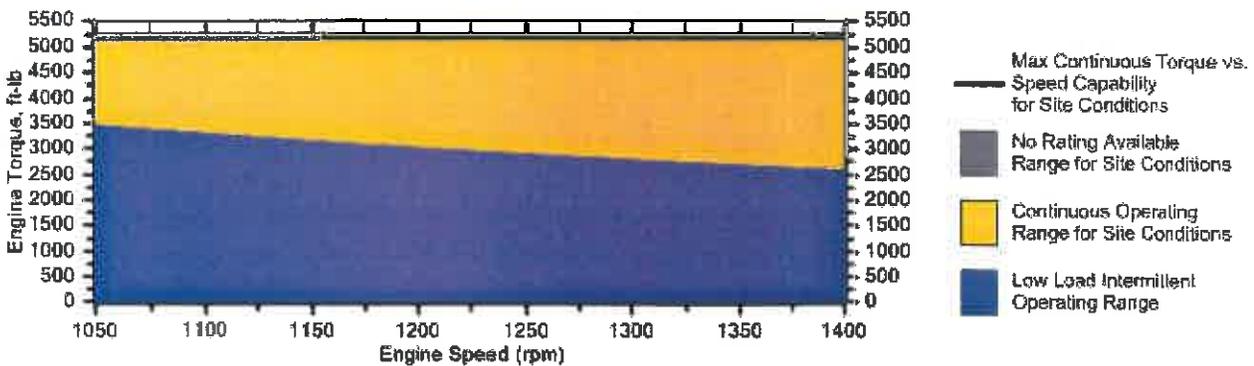
**Engine Power vs. Engine Speed**

Data represents speed sweep at 1200 ft and 90 °F



**Engine Torque vs. Engine Speed**

Data represents speed sweep at 1200 ft and 90 °F



Note: At site conditions of 1200 ft and 90°F inlet air temp., constant torque can be maintained down to 1050 rpm. The minimum speed for loading at these conditions is 1050 rpm.

### NOTES

1. Engine rating is with two engine driven water pumps. Tolerance is  $\pm 3\%$  of full load.
2. Fuel consumption tolerance is  $\pm 3.0\%$  of full load data.
3. Air flow value is on a 'wet' basis. Flow is a nominal value with a tolerance of  $\pm 5\%$ .
4. Inlet and Exhaust Restrictions must not exceed A&I limits based on full load flow rates from the standard technical data sheet.
5. Inlet manifold pressure is a nominal value with a tolerance of  $\pm 5\%$ .
6. Exhaust temperature is a nominal value with a tolerance of  $(+83^{\circ}\text{F}, -54^{\circ}\text{F})$ .
7. Exhaust flow value is on a "wet" basis. Flow is a nominal value with a tolerance of  $\pm 6\%$ .
8. Emissions data is at engine exhaust flange prior to any after treatment.
9. Emission values are based on engine operating at steady state conditions. Fuel methane number cannot vary more than  $\pm 3$ . Values listed are higher than nominal levels to allow for instrumentation, measurement, and engine-to-engine variations. They indicate "Not to Exceed" values. THC, NMHC, and NMNEHC do not include aldehydes. An oxidation catalyst may be required to meet Federal, State or local CO or HC requirements.
10. VOCs - Volatile organic compounds as defined in US EPA 40 CFR 60, subpart JJJJ
11. Exhaust Oxygen level is the result of adjusting the engine to operate at the specified NOx level. Tolerance is  $\pm 0.5$ .
12. Heat rejection values are nominal. Tolerances, based on treated water, are  $\pm 10\%$  for jacket water circuit,  $\pm 50\%$  for radiation,  $\pm 20\%$  for lube oil circuit, and  $\pm 5\%$  for aftercooler circuit.
13. Aftercooler heat rejection includes an aftercooler heat rejection factor for the site elevation and inlet air temperature specified. Aftercooler heat rejection values at part load are for reference only. Do not use part load data for heat exchanger sizing.
14. Cooling system sizing criteria are maximum circuit heat rejection for the site, with applied tolerances.

Constituent	Abbrev	Mole %	Norm		
Water Vapor	H2O	0.0000	0.0000		
Methane	CH4	96.4087	96.4087	Fuel Makeup:	Northeast 4-10-15
Ethane	C2H6	2.8479	2.8479	Unit of Measure:	English
Propane	C3H8	0.1781	0.1781		
Isobutane	iso-C4H10	0.0055	0.0055	<b>Calculated Fuel Properties</b>	
Norbutane	nor-C4H10	0.0157	0.0157	Caterpillar Methane Number:	90.5
Isopentane	iso-C5H12	0.0013	0.0013		
Norpentane	nor-C5H12	0.0015	0.0015	Lower Heating Value (Btu/scf):	931
Hexane	C6H14	0.0226	0.0226	Higher Heating Value (Btu/scf):	1033
Heptane	C7H16	0.0000	0.0000	WOBBE Index (Btu/scf):	1229
Nitrogen	N2	0.2819	0.2819		
Carbon Dioxide	CO2	0.2368	0.2368	THC: Free Inert Ratio:	191.79
Hydrogen Sulfide	H2S	0.0000	0.0000	Total % Inerts (% N2, CO2, He):	0.52%
Carbon Monoxide	CO	0.0000	0.0000	RPC (%) (To 905 Btu/scf Fuel):	100%
Hydrogen	H2	0.0000	0.0000		
Oxygen	O2	0.0000	0.0000	Compressibility Factor:	0.998
Helium	HE	0.0000	0.0000	Stoich A/F Ratio (Vol/Vol):	9.72
Neopentane	neo-C5H12	0.0000	0.0000	Stoich A/F Ratio (Mass/Mass):	16.94
Octane	C8H18	0.0000	0.0000	Specific Gravity (Relative to Air):	0.574
Nonane	C9H20	0.0000	0.0000	Specific Heat Constant (K):	1.311
Ethylene	C2H4	0.0000	0.0000		
Propylene	C3H6	0.0000	0.0000		
TOTAL (Volume %)		100.0000	100.0000		

#### CONDITIONS AND DEFINITIONS

Caterpillar Methane Number represents the knock resistance of a gaseous fuel. It should be used with the Caterpillar Fuel Usage Guide for the engine and rating to determine the rating for the fuel specified. A Fuel Usage Guide for each rating is included on page 2 of its standard technical data sheet.

RPC always applies to naturally aspirated (NA) engines, and turbocharged (TA or LE) engines only when they are derated for altitude and ambient site conditions.

Project specific technical data sheets generated by the Caterpillar Gas Engine Rating Pro program take the Caterpillar Methane Number and RPC into account when generating a site rating.

Fuel properties for Btu/scf calculations are at 60F and 14.696 psia.

Caterpillar shall have no liability in law or equity, for damages, consequently or otherwise, arising from use of program and related material or any part thereof.

#### FUEL LIQUIDS

Field gases, well head gases, and associated gases typically contain liquid water and heavy hydrocarbons entrained in the gas. To prevent detonation and severe damage to the engine, hydrocarbon liquids must not be allowed to enter the engine fuel system. To remove liquids, a liquid separator and coalescing filter are recommended, with an automatic drain and collection tank to prevent contamination of the ground in accordance with local codes and standards.

To avoid water condensation in the engine or fuel lines, limit the relative humidity of water in the fuel to 80% at the minimum fuel operating temperature.

## Gas Analytical

Report Date: Mar 25, 2015 9:43a

Client:	Northeast Natural Energy	Date Sampled:	Mar 20, 2015
Site:	Beach 6H	Analysis Date:	Mar 23, 2015 2:28p
Field No:		Collected By:	
Meter:		Date Effective:	Mar 1, 2015 12:00a
Source Laboratory	Clarksburg (Bridgeport), WV	Sample Pressure (PSI):	939.0
<b>Lab File No:</b>	<b>X_CH1-2124.CHR</b>	Sample Temp (°F):	
Sample Type:	Spot	Field H2O (lb/MMSCFD):	No Test
Reviewed By:		Field H2S (PPM):	No Test

Component	Mol %	Gal/MSCF
Methane	96.4087	
Ethane	2.8479	0.76
Propane	0.1781	0.05
I-Butane	0.0055	0.00
N-Butane	0.0157	0.00
I-Pentane	0.0013	0.00
N-Pentane	0.0015	0.00
Nitrogen	0.2819	
Oxygen	<MDL	
CO2	0.2368	
Hexanes+	0.0226	0.01
TOTAL	100.0000	0.82

Analytical Results at Base Conditions (Real)	
BTU/SCF (Dry):	1,034.7950 BTU/ft <sup>3</sup>
BTU/SCF (Saturated):	1,017.6626 BTU/ft <sup>3</sup>
PSIA:	14.730 PSI
Temperature (°F):	60.00 °F
Z Factor (Dry):	0.99789
Z Factor (Saturated):	0.99754

Analytical Results at Contract Conditions (Real)	
BTU/SCF (Dry):	1,034.7950 BTU/ft <sup>3</sup>
BTU/SCF (Saturated):	1,017.6626 BTU/ft <sup>3</sup>
PSIA:	14.730 PSI
Temperature (°F):	60.00 °F
Z Factor (Dry):	0.99789
Z Factor (Saturated):	0.99754

Calculated Specific Gravities		
Ideal Gravity:	0.5738	Real Gravity: 0.5748
Molecular Wt:	16.6198 lb/lbmol	

Gross Heating Values are Based on:  
 GPA 2145-09, 2186  
 Compressibility is Calculated using AGA-8.

Source	Date	Notes
Gas Analytical	Mar 23, 2015	results to RWarner@NNE-LLC.com

---

# **ATTACHMENT I**

## **Emissions Calculations**

## EMISSIONS SUMMARY

Yost Well Pad  
 Northeast Natural Energy  
 Monongalia County

Source	Description	NOx lb/hr	CO lb/hr	CO2e lb/hr	VOC lb/hr	SO2 lb/hr	PM lb/hr	n-Hexane lb/hr	benzene lb/hr	formaldehyde lb/hr	Total HAPs lb/hr
CE-1	Compressor Engine #1	1.52	0.52	1744	0.730	0.01	0.11	0.00	0.00	0.13	0.290
HTR-1- HTR-3	Three 1.0 MMBTU/Hr GPUs	0.30	0.25	362	0.02	0.00	0.02	0.01	0.00	0.00	0.006
--	Haul Road Fugitive Dust						13.540				
T01-T03	Produced Water Tanks <sup>2</sup>			148	0.04						
--	Equipment Fugitive Emissions			6	0.00						
--	Blowdowns <sup>1</sup>			N/A	N/A						
<b>Total</b>		<b>1.82</b>	<b>0.77</b>	<b>2,260</b>	<b>0.79</b>	<b>0.01</b>	<b>13.68</b>	<b>0.01</b>	<b>0.00</b>	<b>0.13</b>	<b>0.30</b>

Source	Description	NOx tpy	CO tpy	CO2e tpy	VOC tpy	SO2 tpy	PM tpy	n-Hexane TPY	benzene tpy	formaldehyde tpy	Total HAPs tpy
CE-1	Compressor Engine #1	6.66	2.27	7,639	3.20	0.03	0.50	0.01	0.00	0.57	1.270
HTR-1- HTR-3	Three 1.0 MMBTU/Hr GPUs	1.31	1.10	1,587	0.07	0.01	0.10	0.02	0.00	0.00	0.025
--	Haul Road Fugitive Dust						7.57				
T01-T03	Produced Water Tanks <sup>2</sup>			649	0.19						
--	Equipment Fugitive Emissions			26	0.00						
--	Blowdowns <sup>1</sup>			20	0.01						
<b>Total</b>		<b>7.98</b>	<b>3.37</b>	<b>9,921</b>	<b>3.47</b>	<b>0.04</b>	<b>8.17</b>	<b>0.03</b>	<b>0.00</b>	<b>0.57</b>	<b>1.29</b>

<sup>1</sup> See Attachment C for Blowdown Calculations

<sup>2</sup> Water tank emissions are uncontrolled.

## ENGINE EMISSIONS

**Yost Well Pad  
Northeast Natural Energy  
Monongalia County**

**Proposed Emission Rates**

**Source CE-1**

**Engine Data:**

Engine Manufacturer	CAT
Engine Model	3516 B
Type (Rich-burn or Low Emission)	Low Emissions
Aspiration (Natural or Turbocharged)	Natural
Turbocharge Cooler Temperature	130 deg. F
Manufacturer Rating	1,380 hp
Speed at Above Rating	1,400 rpm
Configuration (in-line or Vee)	V-16
Number of Cylinders	16
Engine Bore	6.700 inches
Engine Stroke	7.500 inches
Fuel Heat Content	931 BTU/scf
Engine Displacement	4,231 cu. in.
Fuel Consumption (HHV)	8,255 Btu/bhp-hr

**Emission Rates:**

	g/bhp-hr	lb/hr	tons/year	g/hr	lb/day
Oxides of Nitrogen, NOx	0.50	1.52	6.66	690	38.51
Carbon Monoxide CO	0.17	0.52	2.27	235	12.41
VOC (NMINEHC)	0.24	0.73	3.20	331	17.52
CO <sub>2e</sub>		1744	7638.66		
CO <sub>2</sub>	472	1436	6289.70	651,360	34464.10

AP-42  
4stroke/600  
assembly

**Comment**

453.59 grams = 1 pound  
2,000 pounds = 1 ton

**Total Annual Hours of Operation**

SO <sub>2</sub>	8,760	0.0067	0.0293
PM (Condensable+ Filterable)		0.1138	0.4985
CH <sub>4</sub> as CO <sub>2e</sub>	4.04	307.28	1345.9
N <sub>2</sub> O as CO <sub>2e</sub>		0.7063	3.0936
acrolein		0.0586	0.2565
acetaldehyde		0.0952	0.4171
formaldehyde	0.043	0.1308	0.5730
biphenyl		0.0002	0.0010
benzene		0.0005	0.0021
toluene		0.0004	0.0019
ethylbenzene		4E-05	0.0002
xylene		0.0002	0.0009
methanol		0.0027	0.0118
n-hexane		0.0012	0.0052
total HAPs		0.2899	1.2696

0.000588  
0.000499

**Mfg. Spec Used**

0.0002 Factor From 40 CFR 98, Table C-2

0.000514  
0.000436

**Mfg. Spec Used**

0.000212  
0.00044  
0.000408  
3.97E-05  
0.000184  
0.0022  
0.00111  
0.016394

**Exhaust Parameters:**

Exhaust Gas Temperature	992	deg. F
Exhaust Gas Flow Rate	9216	acfm
Total Exhaust Gas Volume Flow, wet	9,216	acfm
Total Exhaust Gas Volume Flow, dry	153.6	acf per sec
Exhaust Stack Height	260	inches
	21.67	feet
Exhaust Stack Inside Diameter	20	inches
	1.667	feet
Exhaust Stack Velocity	70.4	ft/sec
	4,224.3	ft/min

$$3.1416 \times \frac{4}{x} \times \frac{\text{acfm}}{(\text{stack diameter})^2}$$

**Yost Well Pad  
Northeast Natural Energy  
Monongalia County**

**Potential Emission Rates**

**Sources HTR-1 to HTR-3**

Burner Duty Rating	3000.0 Mbtu/hr	Three Units at 1.0 Mbtu/Hr Each
Burner Efficiency	98.0 %	
Gas Heat Content (HHV)	1032.8 Btu/scf	
Total Gas Consumption	71137.2 scfd	
H2S Concentration	0.000 Mole %	
Hours of Operation	8760	

NOx	0.3001	lbs/hr	1.315	TPY
CO	0.2521	lbs/hr	1.104	TPY
CO2	360.1	lbs/hr	1577.4	TPY
CO2e	362	lbs/hr	1,587	tpy
VOC	0.0165	lbs/hr	0.072	TPY
SO2	0.0018	lbs/hr	0.008	TPY
H2S	0.0000	lbs/hr	0.000	TPY
PM10	0.0228	lbs/hr	0.100	TPY
CHOH	0.0002	lbs/hr	0.001	TPY
Benzene	0.0000	lbs/hr	0.000	TPY
N-Hezane	0.0054	lbs/hr	0.024	TPY
Toluene	0.0000	lbs/hr	0.000	TPY
Total HAPs	0.0056	lbs/hr	0.025	TPY

**AP-42 Factors Used**

NOx	100 Lbs/MMCF
CO	84 Lbs/MMCF
CO <sub>2</sub>	120,000 Lbs/MMCF
VOC	5.5 Lbs/MMCF
PM	7.6 Lbs/MMCF
SO <sub>2</sub>	0.6 Lbs/MMCF
CH <sub>4</sub>	2.3 Lbs/MMCF
N <sub>2</sub> O	2.2 Lbs/MMCF
HCOH	0.075 Lbs/MMCF
Benzene	0.0021 Lbs/MMCF
n-Hexane	1.8 Lbs/MMCF
Toluene	0.0034 Lbs/MMCF

Global Warming Potential = 1

Global Warming Potential = 25

Global Warming Potential =310

## FUGITIVE EMISSIONS

**Yost Well Pad**  
**Northeast Natural Energy**  
**Monongalia County**

### Fugitive VOC Emissions

Volatile Organic Compounds, NMNEHC from gas analysis:	0.68	weight percent
Methane from gas analysis:	93.07	weight percent
Carbon Dioxide from gas analysis:	0.63	weight percent
Gas Density	0.0462	lb/scf

Emission Source:	Number	Oil & Gas Production*	VOC %	VOC, lb/hr	VOC TPY	CO2 lb/Hr	CO2 TPY	CH4 lb/hr	CH4 TPY	CO2e
<b>Valves:</b>										
Gas/Vapor:	18	0.02700 scf/hr	0.7	0.000	0.001	0.000	0.001	0.021	0.0916	2.291
Light Liquid:	-	0.05000 scf/hr	100.0	0.000	0.000					0.000
Heavy Liquid (Oil):	-	0.00050 scf/hr	100.0	0.000	0.000					0.000
Low Bleed Pneumatic	3	1.39000 scf/hr	0.7	0.001	0.006	0.179	0.786	0.179	0.7862	20.440
<b>Relief Valves:</b>										
Relief Valves:	6	0.04000 scf/hr	0.7	0.000	0.000	0.000	0.000	0.010	0.0452	1.131
<b>Open-ended Lines, gas:</b>										
Open-ended Lines, gas:	-	0.06100 scf/hr	0.7	0.000	0.000					0.000
<b>Open-ended Lines, liquid:</b>										
Open-ended Lines, liquid:	-	0.05000 lb/hr	100.0	0.000	0.000					0.000
<b>Pump Seals:</b>										
Gas:	-	0.00529 lb/hr	0.7	0.000	0.000	0.000	0.000	0.000	0.0000	0.000
Light Liquid:	-	0.02866 lb/hr	100.0	0.000	0.000					0.000
Heavy Liquid (Oil):	-	0.00133 lb/hr	100.0	0.000	0.000					0.000
<b>Compressor Seals, Gas:</b>										
Compressor Seals, Gas:	2	0.01940 lb/hr	0.7	0.000	0.001	0.000	0.001	0.002	0.0073	0.184
<b>Connectors:</b>										
Gas:	12	0.00300 scf/hr	0.7	0.000	0.000	0.000	0.000	0.002	0.0068	0.170
Light Liquid:	0	0.00700 scf/hr	100.0	0.000	0.000					0.000
Heavy Liquid (Oil):	-	0.00030 scf/hr	100.0	0.000	0.000					0.000
<b>Flanges:</b>										
Gas:	18	0.00086 lb/hr	0.7	0.000	0.000	0.000	0.000	0.014	0.0631	1.578
Light Liquid:	0	0.00300 scf/hr	100.0	0.000	0.000					0.000
Heavy Liquid:	-	0.0009 scf/hr	100.0	0.000	0.000					0.000

<i>Fugitive Calculations:</i>		
	lb/hr	t/y
VOC	0.001	0.003
CH4	0.049	0.214
CO2	0.001	0.002
CO2e	5.889	25.79

Notes: \*Factors are from 40 CFR 98, Table W-1A (scf/hr), where available. Remaining are API (lb/hr)

**GAS ANALYSIS INFORMATION**

**Yost Well Pad  
Northeast Natural Energy  
Monongalia County**

**Fuel Gas Composition Information:**

	Fuel Gas mole %	Fuel M.W. lb/lb-mole	Fuel S.G.	Fuel Wt. %	LHV, dry Btu/scf	HHV, dry Btu/scf	AFR vol/vol	VOC NM / NE	Z Factor	GPM
Nitrogen, N2	0.2819	0.079	0.003	0.475			-		0.0028	
Carbon Dioxide, CO2	0.2368	0.104	0.004	0.627			-		0.0024	
Hydrogen Sulfide, H2S		-	-	-			-		-	
Helium, He		-	-	-			-		-	
Oxygen, O2		-	-	-			-		-	
Methane, CH4	96.4087	15.467	0.534	93.067	876.7	973.7	9.188		0.9622	
Ethane, C2H6	2.8479	0.856	0.030	5.153	46.1	50.4	0.475		0.0282	0.758
Propane	0.1781	0.079	0.003	0.473	4.1	4.5	0.042	0.473	0.0017	0.049
Iso-Butane	0.0055	0.003	0.000	0.019	0.2	0.2	0.002	0.019	0.0001	0.002
Normal Butane	0.0157	0.009	0.000	0.055	0.5	0.5	0.005	0.055	0.0002	0.005
Iso Pentane	0.0013	0.001	0.000	0.006	0.0	0.1	0.000	0.006	0.0000	0.000
Normal Pentane	0.0015	0.001	0.000	0.007	0.1	0.1	0.001	0.007	0.0000	0.001
Hexane	0.0200	0.017	0.001	0.104	0.9	1.0	0.009	0.104	0.0002	0.008
Heptane	0.0026	0.003	0.000	0.016	0.1	0.1	0.001	0.016	0.0000	0.001
	100.000	16.619	0.574		928.7	1,030.5	9.723	0.678	0.9978	0.823

**Gas Density (STP) = 0.046**

Ideal Gross (HHV)	1,030.5
Ideal Gross (sat'd)	1,013.3
GPM	-
Real Gross (HHV)	1,032.8
Real Net (LHV)	930.8

Gas Data

GAS DATA INFORMATION

Specific Gravity of Air, @ 29.92 in. Hg and 60 -F, 28.9625  
 One mole of gas occupies, @ 14.696 psia & 32 -F 359.2 cu ft. per lb-mole  
 One mole of gas occupies, @ 14.696 psia & 60 -F 379.64 cu ft. per lb-mole

Hydrogen Sulfide (H2S) conversion chart:

0 grains H2S/100 scf	=	0.00000 mole % H2S
		0.0 ppmv H2S
0 mole % H2S	=	0 grains H2S/100 scf
		0.0 ppmv H2S
0 ppmv H2S	=	0.000 grains H2S/100 scf
		0.00000 mole % H2S

Ideal Gas at 14.696 psia and 60°F

		MW lb/mol	Specific Gravity	Lb per Cu Ft	Cu Ft per Lb	LHV, dry Btu/scf	HHV, dry Btu/scf	LHV Btu/lb	HHV Btu/lb	cu ft of air / 1 cu ft of gas	Z factor
Nitrogen	N2	28.013	0.9672	0.0738	13.552	0	0	0	0	0	0.9997
Carbon Dioxide	CO2	44.010	1.5196	0.1159	8.628	0	0	0	0	0	0.9964
Hydrogen Sulfide	H2S	34.076	1.1766	0.0898	11.141	587	637	6,545	7,100	7.15	0.9846
Water	H2O	18.000	0.6215	0.0474	21.091	0	0	0	0	0	1.0006
Oxygen	O2	31.999	1.1048	0.0843	11.864	0	0	0	0	0	0.9992
Methane	CH4	16.043	0.5539	0.0423	23.664	909.4	1,010.0	21,520	23,879	9.53	0.9980
Ethane	C2H6	30.070	1.0382	0.0792	12.625	1,618.7	1,769.6	20,432	22,320	16.68	0.9919
Propane	C3H8	44.097	1.5226	0.1162	8.609	2,314.9	2,516.1	19,944	21,661	23.82	0.9825
Iso-Butane	C4H10	58.124	2.0069	0.1531	6.532	3,000.4	3,251.9	19,629	21,257	30.97	0.9711
Normal Butane	C4H10	58.124	2.0069	0.1531	6.532	3,010.8	3,262.3	19,680	21,308	30.97	0.9667
Iso Pentane	C5H12	72.151	2.4912	0.1901	5.262	3,699.0	4,000.9	19,478	21,052	38.11	1.0000
Normal Pentane	C5H12	72.151	2.4912	0.1901	5.262	3,706.9	4,008.9	19,517	21,091	38.11	1.0000
Hexane	C6H14	86.178	2.9755	0.2270	4.405	4,403.8	4,755.9	19,403	20,940	45.26	0.9879
Heptane	C7H16	100.205	3.4598	0.2639	3.789	5,100.0	5,502.5	22,000	23,000	52.41	0.9947

Real Gas at 14.696 psia and 60°F

		MW lb/mol	Specific Gravity	Lb per Cu Ft	Cu Ft per Lb	LHV, dry Btu/scf	HHV, dry Btu/scf	LHV Btu/lb	HHV Btu/lb	cu ft of air / 1 cu ft of gas	Gal/Mole
Nitrogen	N2	28.013	0.9672	0.0738	13.552	0	0	0	0	0	4.1513
Carbon Dioxide	CO2	44.010	1.5196	0.1159	8.626	0	0	0	0	0	6.4532
Hydrogen Sulfide	H2S	34.076	1.1766	0.0898	11.141	621	672	6,545	7,100	7.15	5.1005
Water	H2O	18.000	0.6215	0.0474	21.091						3.8376
Oxygen	O2	31.999	1.1048	0.0843	11.864	0	0	0	0	0	3.3605
Methane	CH4	16.043	0.5539	0.0423	23.664	911	1,012	21,520	23,879	9.53	6.4172
Ethane	C2H6	30.070	1.0382	0.0792	12.625	1,631	1,783	20,432	22,320	16.68	10.126
Propane	C3H8	44.097	1.5226	0.1162	8.609	2,353	3,354	19,944	21,661	23.82	10.433
Iso-Butane	C4H10	58.124	2.0069	0.1531	6.532	3,101	3,369	19,629	21,257	30.97	12.386
Normal Butane	C4H10	58.124	2.0069	0.1531	6.532	3,094	3,370	19,680	21,308	30.97	11.937
Iso Pentane	C5H12	72.151	2.4912	0.1901	5.262	3,709	4,001	19,478	21,052	38.11	13.86
Normal Pentane	C5H12	72.151	2.4912	0.1901	5.262	3,698	4,009	19,517	21,091	38.11	13.713
Hexane	C6H14	86.178	2.9755	0.2270	4.405	4,404	4,756	19,403	20,940	45.26	15.566
Heptane	C7H16	100.205	3.4598	0.2639	3.789	5,101	5,503	22,000	23,000	52.41	17.468

16.3227  
17.468

**Attachment I  
FUGITIVE EMISSIONS FROM UNPAVED HAULROADS**

*UNPAVED HAULROADS (including all equipment traffic involved in process, haul trucks, endloaders, etc.)*

		PM	PM-10
k =	Particle size multiplier	0.80	0.36
s =	Silt content of road surface material (%)	10	3
p =	Number of days per year with precipitation >0.01 in.	157	157

Item Number	Description	Number of Wheels	Mean Vehicle Weight (tons)	Mean Vehicle Speed (mph)	Miles per Trip	Maximum Trips per Hour	Maximum Trips per Year	Control Device ID Number	Control Efficiency (%)
1	Produced Water Tanker Truck	14	27	10	2.08	1	1118	None	0
2									
3									
4									
5									
6									
7									
8									

**Source:** AP-42 Fifth Edition – 13.2.2 Unpaved Roads

$$E = k \times 5.9 \times (s + 12) \times (S + 30) \times (W + 3)^{0.7} \times (w + 4)^{0.5} \times ((365 - p) + 365) = \text{lb/Vehicle Mile Traveled (VMT)}$$

Where:

		PM	PM-10
k =	Particle size multiplier	0.80	0.36
s =	Silt content of road surface material (%)	10	3
S =	Mean vehicle speed (mph)	10	10
W =	Mean vehicle weight (tons)	27	27
w =	Mean number of wheels per vehicle	14	14
p =	Number of days per year with precipitation >0.01 in.	157	157

For lb/hr:  $[\text{lb} \div \text{VMT}] \times [\text{VMT} \div \text{trip}] \times [\text{Trips} \div \text{Hour}] = \text{lb/hr}$

For TPY:  $[\text{lb} \div \text{VMT}] \times [\text{VMT} \div \text{trip}] \times [\text{Trips} \div \text{Hour}] \times [\text{Ton} \div 2000 \text{ lb}] = \text{Tons/year}$

**SUMMARY OF UNPAVED HAULROAD EMISSIONS**

Item No.	PM				PM-10			
	Uncontrolled		Controlled		Uncontrolled		Controlled	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
1	13.54	7.57	13.54	7.57	1.83	1.02	1.83	1.02
2								
3								
4								
5								
6								
7								
8								
<b>TOTALS</b>	13.54	7.57	13.54	7.57	1.83	1.02	1.83	1.02

## FUGITIVE EMISSIONS FROM PAVED HAULROADS

**INDUSTRIAL PAVED HAULROADS** (including all equipment traffic involved in process, haul trucks, endloaders, etc.)

<b>I =</b>	Industrial augmentation factor (dimensionless)	
<b>n =</b>	Number of traffic lanes	
<b>s =</b>	Surface material silt content (%)	
<b>L =</b>	Surface dust loading (lb/mile)	

Item Number	Description	Mean Vehicle Weight (tons)	Miles per Trip	Maximum Trips per Hour	Maximum Trips per Year	Control Device ID Number	Control Efficiency (%)
1	None						
2							
3							
4							
5							
6							
7							
8							

**Source:** AP-42 Fifth Edition – 11.2.6 Industrial Paved Roads

$$E = 0.077 \times I \times (4 + n) \times (s + 10) \times (L + 1000) \times (W + 3)^{0.7} = \text{lb/Vehicle Mile Traveled (VMT)}$$

Where:

<b>I =</b>	Industrial augmentation factor (dimensionless)	
<b>n =</b>	Number of traffic lanes	
<b>s =</b>	Surface material silt content (%)	
<b>L =</b>	Surface dust loading (lb/mile)	
<b>W =</b>	Average vehicle weight (tons)	

For lb/hr:  $[\text{lb} \div \text{VMT}] \times [\text{VMT} \div \text{trip}] \times [\text{Trips} \div \text{Hour}] = \text{lb/hr}$

For TPY:  $[\text{lb} \div \text{VMT}] \times [\text{VMT} \div \text{trip}] \times [\text{Trips} \div \text{Hour}] \times [\text{Ton} \div 2000 \text{ lb}] = \text{Tons/year}$

### SUMMARY OF PAVED HAULROAD EMISSIONS

Item No.	Uncontrolled		Controlled	
	lb/hr	TPY	lb/hr	TPY
1				
2				
3				
4				
5				
6				
7				
8				
<b>TOTALS</b>				

**Northeast Natural Energy, LLC**  
**Yost Well Pad**  
**Produced Water Tank Emissions**

Utilizing direct measurements of tank vent emissions from Produced Water Tanks at nearby well pad (attached), gas emissions were determined to be 120 scfd at a water production rate of 13 BBL/day. Thus, with an anticipated maximum water production rate at the Yost Well Pad being 15 BBL/hr, an emission rate of 3323 SCFD is anticipated  $[120 \times 15/13 \times 24]$ . The natural gas constituents were forced into solution in the Produced Water by the high pressures in the gas production zone. As they are not soluble in water, they are quickly released as the pressure on the water is released as it progresses from the well to the atmospheric pressure tank (flash gas). Consequently, working and breathing emissions are nominal.

The composition of the flash gas is assumed to be very similar to that of the production gas. Given that the density of the production gas is calculated to be 0.046 lb/scf, a flash gas rate of 3323 SCFD equates to 152.8 lb/day. This gas is very dry, containing only 0.68% VOCs. Thus, potential VOC emissions from the tanks are estimated at 1.04 lb/day or 0.04 lb/hr. Annual VOC emissions are projected to be 379 pounds  $[152.8 \times 365 \times 0.68\%]$  or 0.19 tpy.

Methane comprises approximately 93.1% of the gas. Thus, methane emissions are projected to be 5.93 lb/hr  $[152.8/24 \times .931]$  or 26.0 tpy. Using a GHG factor of 25, potential CO<sub>2e</sub> emissions will be 148 lb/hr or 649 tpy

# G3516TALF-IGT-4, 2 Stage

(Note: assume real gas behavior and used OD for volume calc)

Cylinders	Bore, in	Stroke, in	Rod Diameter, in	Pocket Clearance, in <sup>3</sup>	Total Cylinder Volume, in <sup>3</sup>
1st Stage Cylinder	6.38	4.50	2.00	0.00	129
1st Stage Cylinder	6.38	4.50	2.00	0.00	129
2nd Stage Cylinder	6.38	4.50	2.00	0.00	129
2nd Stage Cylinder	6.38	4.50	2.00	0.00	129

Scrubbers/Suction & Discharge Drums	OD, in	Height/Length, in	Total Volume, in <sup>3</sup>
1st Stage Scrubber	24.00	68.00	30762
1st Stage Suction Drum	16.00	114.50	23022
1st Stage Discharge Drum	16.00	114.50	23022
2nd Stage Scrubber	24.00	68.00	30762
2nd Stage Suction Drum	16.00	114.50	23022
2nd Stage Discharge Drum	16.00	114.50	23022

Cooler Section	No. of Tubes	OD, in	Length, in	Total Cooler Tube Volume, in <sup>3</sup>
1st Stage Cooler Section	86	0.75	216	8207
2nd Stage Cooler Section	146	0.75	216	13932

Piping	OD, in	Length, in	Total Piping Volume, in <sup>3</sup>
1st Stg Piping	6.00	150.00	4241
2nd Stg Piping	6.00	150.00	4241

Equipment	Volume, in <sup>3</sup>	Temperature, R	Pressure, psig	Calculated Moles
1st Stage Total	89512	718	160	1.17
2nd Stage Total	95238	715	390	2.91

Total Moles = 4.08

Estimated

Total Volume of Blowdown Gas @ STP =

1570 ft<sup>3</sup>

Does not include fuel scrubber

---

**ATTACHMENT J**

**Class I Legal Advertisement**

**Affidavit Notice Will Be Submitted  
Upon Receipt**

**AIR QUALITY PERMIT NOTICE**  
**Notice of Application**

Notice is given that Northeast Natural Energy LLC has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a G70A General Permit Registration for its Yost Well Pad located off of Daybrook Road in Monongalia County, West Virginia ( Lat.39.62963, Long.-80.21489).

The applicant estimates the potential to discharge the following regulated air pollutants:

- 7.98 tons of Nitrogen Oxides per year
- 3.37 tons of Carbon Monoxide per year
- 3.47 tons of Volatile Organics per year
- 0.04 tons of Sulfur Dioxide per year
- 8.17 tons of Particulate Matter per year
- 0.57 tons of Formaldehyde per year
- 0.03 tons of n-Hexane
- 9,921 tons of Greenhouse Gases per year

Startup of operation is planned to begin upon approval of this permit. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57<sup>th</sup> Street, SE, Charleston, WV 25304, for at least 30 calendar days from the date of publication of this notice.

Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499, extension 1227, during normal business hours.

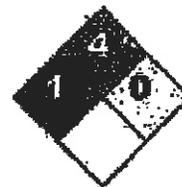
Dated this the **(Day)** day of **(Month)**, **(Year)**.

By: Mr. Brett Loflin  
Vice President Regulatory Affairs  
Northeast Natural Energy, LLC

---

**ATTACHMENT N**

**Material Safety Data Sheets**



# Material Safety Data Sheet

Material Name: Produced Water

Health	1
Flammability	4
Reactivity	0
PPE	

## \*\*\* Section 1 - Chemical Product and Company Identification \*\*\*

Product name: Produced Water - Sweet  
 Synonyms: Salt Water, H<sub>2</sub>O, Oily Water, Formation Water  
 Chemical Family: Water  
 Formula: Complex mixture

Emergency Phone Number: Chemtec - 800-424-9300

## \*\*\* Section 2 - Hazards Identification \*\*\*

### Emergency Overview

May cause eye, skin, respiratory and gastrointestinal tract irritation.

Potential Health Effects: Eyes

May cause eye irritation.

Potential Health Effects: Skin

Contact may cause skin irritation.

Potential Health Effects: Ingestion

Ingestion may cause irritation of the digestive tract that may result in nausea, vomiting and diarrhea.

Potential Health Effects: Inhalation

Breathing the mist and vapors may be irritating to the respiratory tract.

HMS Ratings: Health: 1 Fire: 4 HMIS Reactivity 0

Hazard Scale: 0 = Minimal 1 = Slight 2 = Moderate 3 = Serious 4 = Severe \* = Chronic hazard

## \*\*\* Section 3 - Composition / Information on Ingredients \*\*\*

Produced water is a mixture of varying amounts of water and oil produced from various exploration and production processes. Produced water may contain an upper layer of flammable liquid and vapor hydrocarbons. Produced water may include small amounts of natural gas condensate, and benzene may be present.

CAS #	Component	Percent
7732-18-8	Water	~88
Not Available	Dissolved Minerals	~32
71-43-2	Benzene	<1
8002-08-9	Petroleum distillates (naphtha)	<1

Normal composition ranges are shown. Exceptions may occur depending on the source of the produced water.

## \*\*\* Section 4 - First Aid Measures \*\*\*

### First Aid: Eyes

Flush eyes with clean, low-pressure water for at least 15 minutes, occasionally lifting the eyelids. If pain or redness persists after flushing, obtain medical attention. If eye is exposed to hot liquid, cover eyes with cloth and seek medical attention immediately.

### First Aid: Skin

In case of hot liquid exposure, do not remove clothing or treat-wash only unburned area and seek medical attention immediately.

### First Aid: Ingestion

Do not induce vomiting. Seek medical attention.

### First Aid: Inhalation

Immediately remove person to area of fresh air. For respiratory distress, give oxygen, rescue breathing, or administer CPR if necessary. Obtain prompt medical attention.

# Material Safety Data Sheet

Material Name: Produced Water

## \*\*\* Section 5 - Fire Fighting Measures \*\*\*

### General Fire Hazards

See Section 9 for Flammability Properties.

May react with strong oxidizing materials and a wide variety of chemicals. Forms explosive mixtures with air.

### Hazardous Combustion Products

Not Determined.

### Extinguishing Media

Dry chemical, foam, carbon dioxide, or water spray.

### Fire Fighting Equipment/Instructions

Any fire would be associated with any natural gas condensate floating on the surface of the produced water.

Water may be ineffective on flames but should be used to keep fire exposed containers cool. Keep the surrounding areas cool by using water mists. Firefighters should wear self-contained breathing apparatus and full protective clothing.

NFPA Ratings: Health: 1 Fire: 4 Reactivity: 0

Hazard Scale: 0 = Minimal 1 = Slight 2 = Moderate 3 = Serious 4 = Severe

## \*\*\* Section 6 - Accidental Release Measures \*\*\*

### Containment Procedures

Stop the source of the leak or release. Clean up releases as soon as possible, observing precautions in Personal Protection Equipment section. Contain liquid to prevent further contamination of soil and surface water.

### Clean-Up Procedures

Take up with sand or other oil absorbing materials. Carefully shovel, scoop or sweep up into a waste container for reclamation or disposal. Response and clean-up crews must be properly trained and must utilize proper protective equipment. Where feasible and appropriate, remove contaminated soil or flush with fresh water. Follow prescribed procedures for reporting and responding to larger releases. Advise authorities and the National Response Center (800-424-8802) if the release is to a watercourse.

### Evacuation Procedures

Evacuate nonessential personnel and remove or secure all ignition sources. Consider wind direction; stay upwind and uphill, if possible.

### Special Procedures

Avoid excessive skin contact with the spilled material.

## \*\*\* Section 7 - Handling and Storage \*\*\*

### Handling Procedures

Handle as a flammable liquid. Keep away from heat, sparks, and open flame. Electrical equipment should be approved for classified area. Bond and ground containers during product transfer to reduce the possibility of static-initiated fire or explosion.

### Storage Procedures

Keep away from flame, sparks, excessive temperatures and open flame. Use approved vented containers. Keep containers closed and clearly labeled. Empty product containers or vessels may contain explosive vapors. Do not pressurize, cut, heat, weld or expose such containers to sources of ignition. Do not enter storage areas and confined spaces without adequate ventilation. Use appropriate respiratory protection if there is a potential to exceed component exposure limit(s).

## \*\*\* Section 8 - Exposure Controls / Personal Protection \*\*\*

### A: Component Exposure Limits

Petroleum distillates (naphtha) (8002-05-9)

OSHA: 600 ppm TWA; 2000 mg/m<sup>3</sup> TWA

NIOSH: 350 mg/m<sup>3</sup> TWA

1800 mg/m<sup>3</sup> Ceiling (15 min)

## Material Safety Data Sheet

Material Name: Produced Water

### Benzene (71-43-2)

ACGIH: 0.5 ppm TWA  
2.5 ppm STEL  
Skin - potential significant contribution to overall exposure by the cutaneous route  
OSHA: 10 ppm TWA; 25 ppm ceiling; 50 ppm (10 min.)  
NIOSH: 0.1 ppm TWA  
1 ppm STEL

### Engineering Controls

Use adequate ventilation to keep vapor concentrations of this product below occupational exposure and flammability limits, particularly in confined spaces.

### PERSONAL PROTECTIVE EQUIPMENT

#### Personal Protective Equipment: Eyes/Face

Chemical goggles or face shield should be worn when handling product if the possibility of spray exists.

#### Personal Protective Equipment: Skin

Normal working clothes should be worn. Wash contaminated clothing prior to reuse.

#### Personal Protective Equipment: Respiratory

Respiratory protection is not required for normal use. At excessive concentrations, wear a NIOSH approved air purifying respirator with organic vapor cartridges.

#### Personal Protective Equipment: General

A source of clean water should be in the work area for flushing eyes and skin.

### \*\*\* Section 9 - Physical & Chemical Properties \*\*\*

Appearance:	Clear or opaque	Odor:	Salty with a slight hydrocarbon odor,
Physical State:	Liquid	pH:	4.9-8.5
Vapor Pressure:	NA	Vapor Density:	1.2
Boiling Point:	212°F	Melting Point:	ND
Solubility (H <sub>2</sub> O):	Soluble	Specific Gravity:	>1 @ 0°C
Freezing Point:	<32°F	Evaporation Rate:	ND
VOC:	ND	Octanol/H <sub>2</sub> O Coeff.:	ND
Flash Point:	ND	Flash Point Method:	ND
		Lower Flammability Limit (LFL):	4.0
		Upper Flammability Limit (UFL):	46.0
		Burning Rate:	ND
		Auto Ignition:	NA

### \*\*\* Section 10 - Chemical Stability & Reactivity Information \*\*\*

#### Chemical Stability

Stable under normal ambient and anticipated conditions of storage and handling.

#### Chemical Stability: Conditions to Avoid

Keep material away from heat, sparks, and open flames.

#### Incompatibility

Keep away from strong oxidizers.

#### Hazardous Decomposition

Not Determined.

#### Possibility of Hazardous Reactions

Will not occur.

# Material Safety Data Sheet

Material Name: Produced Water

## \*\*\* Section 11 - Toxicological Information \*\*\*

### Acute Dose Effects

#### Component Analysis - LD50/LC50

Water (7732-18-5)

Oral LD50 Rat: >90 mL/kg

Petroleum distillates (naphtha) (8002-05-9)

Oral LD50 Rat: >4900 mg/kg; Dermal LD50 Rabbit: >2000 mg/kg

Benzene (71-43-2)

Inhalation LC50 Rat: 13050-14380 ppm/4H; Oral LD50 Rat: 1800 mg/kg

### Carcinogenicity

#### Component Carcinogenicity

Petroleum distillates (naphtha) (8002-05-9)

IARC: Monograph 45 [1989] (Group 3 (not classifiable))

Benzene (71-43-2)

ACGIH: A1 - Confirmed Human Carcinogen

OSHA: 10 ppm TWA; 25 ppm ceiling; 50 ppm (10 min.)

NIOSH: potential occupational carcinogen

NTP: Known Human Carcinogen (Select Carcinogen)

IARC: Supplement 7 [1987], Monograph 28 [1982] (Group 1 (carcinogenic to humans))

## \*\*\* Section 12 - Ecological Information \*\*\*

### Ecotoxicity

#### Component Analysis - Ecotoxicity - Aquatic Toxicity

Petroleum distillates (naphtha) (8002-05-9)

Test & Species

96 Hr LC50 Salmo gairdneri

258 mg/L [static]

Conditions

24 Hr EC50 Daphnia magna

36 mg/L

Benzene (71-43-2)

Test & Species

96 Hr LC50 Pimephales promelas

12.6 mg/L [flow-through]

Conditions

96 Hr LC50 Oncorhynchus mykiss

5.3 mg/L [flow-through]

96 Hr LC50 Lepomis macrochirus

22 mg/L [static]

96 Hr LC50 Poecilia reticulata

25.6 mg/L [static]

72 Hr EC50 Selenastrum

29 mg/L

capricornutum

48 Hr EC50 water flea

366 mg/L [static]

48 Hr EC50 Daphnia magna

10 mg/L

## Material Safety Data Sheet

Material Name: Produced Water

### \*\*\* Section 13 - Disposal Considerations \*\*\*

This product as produced is not specifically listed as an EPA RCRA hazardous waste according to federal regulations (40 CFR 261). However, when discarded or disposed of, it may meet the criteria of a "characteristic" hazardous waste. This product could also contain benzene at low concentrations and may exhibit the characteristic of "toxicity" (D018) as determined by the toxicity characteristic leaching procedure (TCLP). This material could become a hazardous waste if mixed with or contaminated with a hazardous waste or other substance(s). It is the responsibility of the user to determine if disposal material is hazardous according to federal, state and local regulations.

### \*\*\* Section 14 - Transportation Information \*\*\*

#### US DOT Information

Shipping Name: Not Regulated

Additional Info.: This may not apply to all shipping situations. Consult 49CFR 172 for additional information.

### \*\*\* Section 15 - Regulatory Information \*\*\*

#### US Federal Regulations

#### Component Analysis

This material may contain one or more of the following chemicals identified under SARA Section 302 (40 CFR 365 Appendix A), SARA Section 313 (40 CFR 372.65) and/or CERCLA (40 CFR 302.4).

#### Benzene (71-43-2)

SARA 313: 0.1 % de minimis concentration

CERCLA: 10 lb final RQ (received an adjusted RQ of 10 lbs based on potential carcinogenicity in an August 14, 1989 final rule); 4.54 kg final RQ (received an adjusted RQ of 10 lbs based on potential carcinogenicity in an August 14, 1989 final rule)

#### State Regulations

#### Component Analysis - State

The following components appear on one or more of the following state hazardous substances lists:

Component	CAS	CA	MA	MIN	NJ	PA	RI
Petroleum distillates (naphtha)	8002-05-9	No	Yes	Yes	Yes	Yes	Yes
Benzene	71-43-2	Yes	Yes	Yes	Yes	Yes	Yes

The following statement(s) are provided under the California Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65):

WARNING! This product contains a chemical known to the state of California to cause cancer.

WARNING! This product contains a chemical known to the state of California to cause reproductive/developmental effects.

#### Component Analysis - WHMIS IDL

The following components are identified under the Canadian Hazardous Products Act Ingredient Disclosure List:

Component	CAS #	Minimum Concentration
Benzene	71-43-2	0.1 %

#### Additional Regulatory Information

# Material Safety Data Sheet

Material Name: Produced Water

## Component Analysis - Inventory

Component	CAS #	TSCA	CAN	BEC
Water	7732-18-5	Yes	DSL	EINECS
Petroleum distillates (naphtha)	8002-05-9	Yes	DSL	EINECS
Benzene	71-43-2	Yes	DSL	EINECS

## \*\*\* Section 16 - Other Information \*\*\*

### Other Information

The information presented herein has been compiled from sources considered to be dependable and is accurate and reliable to the best of our knowledge and belief, but is not guaranteed to be so. Since conditions of use are beyond our control, we make no warranties, expressed or implied, except those that may be contained in our written contract of sale or acknowledgement.

Vendor assumes no responsibility for injury to vendee or third persons proximately caused by the material if reasonable safety procedures are not adhered to as stipulated in the data sheet. Additionally, vendor assumes no responsibility for injury to vendee or third persons proximately caused by abnormal use of the material, even if reasonable safety procedures are followed. Furthermore, vendee assumes the risk in their use of the material.

### Key/Legend

- NA - Not Applicable
- ND - Not Determined
- ACGIH - American Conference of Governmental Industrial Hygienists
- OSHA - Occupational Safety and Health Administration
- TLV - Threshold Limit Value
- PEL - Permissible Exposure Limit
- RQ - Reportable Quantity
- TWA - Time Weighted Average
- STEL - Short Term Exposure Limit
- NTP - National Toxicology Program
- IARC - International Agency for Research on Cancer

---

**ATTACHMENT O**

**Emissions Summary Sheets**

**G70-A EMISSIONS SUMMARY SHEET**

Emission Point ID No.	Emission Point Type <sup>1</sup>	Emission Unit Vented Through This Point		Air Pollution Control Device		All Regulated Pollutants - Chemical Name/CAS <sup>2</sup> (Speciate VOCs & HAPS)	Maximum Potential Uncontrolled Emissions <sup>3</sup>		Maximum Potential Controlled Emissions <sup>4</sup>		Emission Form or Phase (At exit conditions, Solid, Liquid or Gas/Vapor)	Est. Method Used <sup>5</sup>
		ID No.	Source	ID No.	Device Type		lb/hr	ton/yr	lb/hr	ton/yr		
1E	Upward Vertical Stack	HTR-1	GPU	None		NOx	0.10	0.44	0.10	0.44	Gas	EE
						CO	0.08	0.37	0.08	0.37	Gas	EE
						VOC	<0.01	0.02	<0.01	0.02	Gas	EE
						PM	<0.01	0.03	<0.01	0.03	Solid	EE
						HCOH	<0.01	<0.01	<0.01	<0.01	Gas	EE
2E	Upward Vertical Stack	HTR-2	GPU	None		Total HAPs	<0.01	0.03	<0.01	0.03	Gas	EE
						CO <sub>2e</sub>	121	529	121	529	Gas	EE
						NOx	0.10	0.44	0.10	0.44	Gas	EE
						CO	0.08	0.37	0.08	0.37	Gas	EE
						VOC	<0.01	0.02	<0.01	0.02	Gas	EE
3E	Upward Vertical Stack	HTR-3	GPU	None		PM	<0.01	0.03	<0.01	0.03	Solid	EE
						HCOH	<0.01	<0.01	<0.01	<0.01	Gas	EE
						Total HAPs	<0.01	0.03	<0.01	0.03	Gas	EE
						CO <sub>2e</sub>	121	529	121	529	Gas	EE
						NOx	0.10	0.44	0.10	0.44	Gas	EE
4E	Upward Vertical Stack	CE-1	Engine	None		CO	7.39	32.38	0.52	2.27	Gas	EE
						VOC	1.46	6.40	0.73	3.20	Gas	EE
						PM	0.11	0.50	0.114	0.50	Solid	EE
						HCOH	1.32	5.73	0.131	0.57	Gas	EE
						Total HAPs	1.47	6.43	0.290	1.27	Gas	EE
						CO <sub>2e</sub>	1744	7639	1744	7639	Gas	EE

## G70-A EMISSIONS SUMMARY SHEET

Emission Point ID No.	Emission Point Type <sup>1</sup>	Emission Unit Vented Through This Point	Air Pollution Control Device	All Regulated Pollutants - Name/CAS <sup>2</sup>	Maximum Potential Uncontrolled Emissions <sup>3</sup>	Maximum Potential Controlled Emissions <sup>4</sup>	Emission Form or Phase (At exit conditions)	Est. Method Used <sup>5</sup>
5E-7E	Relief Vent	T01-T03 Produced Water	None	NOx	0.04	0.19	Gas	EE
				CO			Gas	EE
8E	Fugitive	TL-1 Produced Water Truck Loading	None	VOC	<0.01	<0.01	Gas	EE
				PM			Solid	EE
				HCOH	<0.01	<0.01	Gas	EE
				Total HAPs			Gas	EE
				CO2e	148	649	Gas	EE
				NOx	<0.01	<0.01	Gas	EE
				CO			Gas	EE
				VOC	<0.01	<0.01	Gas	EE
				PM			Solid	EE
				HCOH	<0.01	<0.01	Gas	EE
				Total HAPs			Gas	EE
				CO2e	<0.01	<0.01	Gas	EE

The EMISSION SUMMARY SHEET provides a summation of emissions by emission unit. Note that uncaptured process emission unit emissions are not typically considered to be fugitive and must be accounted for on the appropriate EMISSIONS UNIT DATA SHEET and on the EMISSIONS SUMMARY SHEET. Please note that total emissions from the source are equal to all vented emissions, all fugitive emissions, plus all other emissions (e.g. uncaptured emissions). Please complete the FUGITIVE EMISSIONS DATA SUMMARY SHEET for fugitive emission activities.

<sup>1</sup> Please add descriptors such as upward vertical stack, downward vertical stack, relief vent, rain cap, etc.

<sup>2</sup> List all regulated air pollutants. Speciate VOCs, including all HAPs. Follow chemical name with Chemical Abstracts Service (CAS) number. LIST Acids, CO, CS<sub>2</sub>, VOCs, H<sub>2</sub>S, Inorganics, Lead, Organics, O<sub>3</sub>, NO, NO<sub>2</sub>, SO<sub>2</sub>, SO<sub>3</sub>, all applicable Greenhouse Gases (including CO<sub>2</sub> and methane), etc. DO NOT LIST H<sub>2</sub>, H<sub>2</sub>O, N<sub>2</sub>, O<sub>2</sub>, and Noble Gases

<sup>3</sup> Give maximum potential emission rate with no control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).

<sup>4</sup> Give maximum potential emission rate with proposed control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).

<sup>5</sup> Indicate method used to determine emission rate as follows: MB = material balance; ST = stack test (give date of test); EE = engineering estimate; M = modeling; O = other (specify).

---

**ATTACHMENT P**

**Other Supporting Documentation**

# **Yost Well Pad Attachment P Regulatory Analysis**

Both State and Federal environmental regulations governing air emissions apply to the planned Yost Well Pad. The West Virginia Department of Environmental Protection (WVDEP) has been delegated the authority to implement certain federal air quality requirements for the state. Air quality regulations that potentially affect the modification are discussed herein.

## **1.1 PSD and NSR**

The facility will be a minor source with respect to Prevention of Significant Deterioration (PSD) regulations as it will not have the potential to emit more than the annual emission thresholds of any PSD regulated pollutant with the voluntary restrictions (e.g., catalytic converter on the engine).

The facility is within an area designated as attainment for all criteria pollutants. Consequently, the facility is not subject to the New Source Review (NSR) regulations. Consequently, NSR requirements are not applicable to this project.

## **1.2 Title V Operating Permit Program**

West Virginia has incorporated provisions of the federal Title V operating permit program. Thresholds for inclusion under the Title V program are 10 tpy of any single Hazardous Air Pollutant (HAP) or 25 tons of any combination of HAP and/or 100 tpy of all other regulated pollutants. Additionally, facilities regulated under certain New Source Performance Standards (NSPS) require facilities to have Title V permits.

The facility will be a minor source. Additionally, the NSPS regulating this facility does not trigger a Title V permit. Hence, a Title V permit will not be required for the Yost Well Pad Production Facility.

## **1.3 Aggregation**

Source aggregation determinations are typically made based on the following criteria:

- Whether the facilities are under common control,
- Whether the facilities belong to the same Major Group (i.e. the first two digit code) as described in the Standard Industrial Classification Manual, 1972, as amended by the 1977 Supplement;
- Whether the facilities are located on one or more contiguous or adjacent properties; and the distance between all pollutant emitting activities,
- Whether the facilities can operate independently

Only if all criteria are met does a permitting authority aggregate the facilities into a single source.

This Northeast Natural Energy facility will receive and manage raw natural gas and associated produced water from the wells. After separation of the produced water, the gas will be injected into gathering lines for transportation via pipeline owned and operated by others to a compressor station, owned and operated by others, where it will be compressed, dehydrated and injected into a transmission line for transportation to customers.

The Yost Well Pad and the receiving compressor station are under the same general SIC Code. They are not under common ownership and will not have a sharing of staff. Additionally, as the gas can also flow to other compressor stations further away, there is no dependency of the Yost Well Pad on this compressor station. Additionally, operation of this compressor station is not dependent upon the Yost Well Pad as it also receives gas from other well pads. Lastly, the distance between the planned Yost Well Pad and the receiving compressor station (> 1.0 miles) does not rise to the definition of contiguous or adjacent. Thus, not all of the criteria for aggregation are met. Hence, emissions from the Yost Well Pad should not be aggregated with those of the receiving compressor station.

The closest Northeast Natural Energy facility to the Yost Well Pad is its Statler Well Pad. This facility is under common ownership, under the same SIC code and may, from time to time, have a sharing of staff. However, these two well pads are approximately 5.3 miles apart. Lastly, there is no interconnection or interdependency between these two facilities. Gas from one well pad does not flow to the other. Accordingly, the operation of one well pad is not dependent upon the operation of the other. Thus, given the lack of dependency and the distance of separation, emissions from these two well pads should not be aggregated.

#### **1.4 New Source Performance Standards**

New Source Performance Standards (NSPS) regulations promulgated under 40 CFR 60 require new and reconstructed facilities to control emissions to the level achievable by Best-Available Control Technology (BACT). Specific NSPS requirements potentially applicable to the Well Pad Production Facility are as follows:

- 40 CFR 60, Subpart Dc—Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
- 40 CFR 60, Subpart KKK – Equipment Leaks of VOC from Onshore Natural Gas Processing Stations
- 40 CFR 60, Subpart LLL – Onshore Natural Gas Processing Stations: SO<sub>2</sub> Emissions
- 40 CFR 60, Subpart JJJJ – Stationary Spark Ignition Internal Combustion Engines
- 40 CFR 60, Subpart OOOO - Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution

1.4.1 Subpart Dc

This subpart limits SO<sub>2</sub> and PM emissions from boilers and heaters fired by various fuels. While the primary thrust of this set of regulations is to control SO<sub>x</sub> and PM emissions from coal and oil-fired boilers and heaters, natural gas fired units are also covered under this rule. The planned Gas Processing Units have heat inputs that are well below the threshold of coverage for this rule (10 MMBTU/Hr). Thus, this rule does not apply.

1.4.2 Subpart KKK

This subpart limits VOC emissions from equipment at a natural gas processing station. The planned Well Pad does not meet the definition of a processing station under this rule. Hence, this rule does not apply.

1.4.3 Subpart LLL

This set of regulations governs emissions from processes used to remove sulfur gases from the field gas stream (sweetening unit) and subsequent sulfur recovery operations. The field gas that will be extracted at this Well Pad does not contain sufficient sulfur compounds to warrant a sweetening unit. Accordingly, not such equipment will be present. Hence, this rule does not apply.

1.4.4 Subpart IIII

This subpart governs emissions from new compression ignition internal combustion engines (CI ICE) manufactured after July 11, 2005. There will be no compression ignition engines (e.g. diesel-fired emergency generator) at this station. Hence, this rule does not apply.

1.4.5 Subpart JJJJ

This subpart governs emissions from new stationary spark ignition internal combustion engines (SI ICE) manufactured after July 1, 2007. The driver for sole gas compressor at this facility will be SI ICE units manufactured after this date. Accordingly, this rule applies to this engine. More specifically, 60.4233(e) stipulates that non-emergency natural gas-fired lean burn engines >500 HP and <1350 HP must comply with the applicable emission standards of Table 1 of this Subpart. The engine, including the catalytic control unit, will meet this standard.

1.4.6 Subpart OOOO

This subpart governs emissions from a broad spectrum of operations in the oil and natural gas industries, including operations at natural gas well pads. The potentially applicable sections of this rule sets restrictions, recordkeeping and reporting requirements on emissions from storage vessels with potential VOC emissions greater than 6 tons per year, fugitive emissions, reciprocating compressors and pneumatic controllers. This rule applies to the Yost Well Pad Production Facility.

One of the key components to this rule [40 CFR 60.5390(b)] applicable to the Yost Well Pad is the requirement that all pneumatic controllers located between the well head and a processing

plant must have a bleed rate of less than 6 scfh. All pneumatic controllers to be installed at Yost Well Pad will meet these criteria.

This rule also stipulates that storage vessels with VOC emissions equal to or greater than 6 tpy must control those emissions by 95% by October 15, 2013. The Produced Water tanks at the Yost Well Pad will have an estimated *uncontrolled* VOC emission rate well below this threshold. Thus, emissions from these tanks do not fall under NSPS Subpart OOOO.

## 1.5 National Emission Standards for Hazardous Air Pollutants

National Emission Standards for Hazardous Air Pollutants (NESHAPs) promulgated under 40 CFR 63 regulate the emission of Hazardous Air Pollutants (HAPs) from certain industrial processes. In general, these rules apply to major sources of HAPs with a major source being defined as having the potential to emit more than 10 tpy of any individual HAP or 25 tpy of total HAPs. Emissions standards under these rules have been established as the Maximum Achievable Control Technology (MACT) for each source category. The following NESHAP source category standards are potentially applicable to the planned Yost Well Pad Production Facility:

- 40 CFR 63, Subpart ZZZZ – NESHAP from Stationary Reciprocating Internal Combustion Engines
- 40 CFR 63, Subpart DDDDD – NESHAP for Industrial, Commercial and Institutional Boilers and Process Heaters

### 1.5.1 Subpart ZZZZ

This Subpart governs emissions from a stationary reciprocating internal combustion engine (RICE) located both at major and area source of HAPs. The facility will not be a major source of HAPs, but will be considered an area source of HAPs. Hence, this rule is potentially applicable to the facility. In accordance with 40 CFR 63.6590(a)(2)(iii), the single engine at the planned Yost Well Pad Production Facility will not be considered an Existing Stationary RICE. Rather, it will be considered “new” engine. Thus, the engine will meet the requirements of this rule by meeting the requirements of NSPS, Subpart JJJJ as described above.

### 1.5.2 Subpart DDDDD

This Subpart applies to industrial boilers and process heaters of various sizes and fuel types located at facilities that are classified as a major source of HAPs. As the planned facility is not a major source of HAPs, this rule does not apply.

## 1.6 Chemical Accident Prevention

Subparts B-D of 40 CFR 68 present the requirements for the assessment and subsequent preparation of a Risk Management Plan (RMP) for a facility that stores more than a threshold quantity of a regulated substance listed in 40 CFR 68.130. If a facility stores, handles or

processes one or more regulated substances in an amount greater than its corresponding threshold, the facility must prepare and implement an RMP. The Yost Well Pad will not store more than 10,000 lbs of a flammable mixture comprised of the substances listed in Table 3 in 40 CFR 68.130. Hence, it is not covered under this rule.

## 1.7 West Virginia State Requirements

### 1.7.1 45 CSR 2

The purpose of 45CSR2 is to control smoke and particulate matter emissions from fuel burning units. The facility is subject to the opacity requirement of 45 CSR 2. Emissions from the facility cannot exceed 10% over any six minute period.

### 1.7.2 45 CSR 4

This regulation prohibits the emission of objectionable odors. Northeast Natural Energy is obligated to run the station in a manner that does not produce objectionable odors.

### 1.7.3 45 CSR 6

This rule establishes emission standards for particulate matter and other requirements for incineration of refuse not subject to or specifically exempted from federal regulation. The GPUs and compressor engine fall under Section 4.1 of this rule. PM emissions from these devices must remain below the allowable limit calculated under this rule.

The emissions must also meet the visible emissions requirements of this rule limiting visible emissions to 20% opacity.

### 1.7.4 45 CSR 10

This regulation limits emissions of sulfur oxides. As the sulfur content of the Inlet Gas contains no measurable sulfur, emissions of sulfur oxides is negligible. Thus, while parts of this rule are applicable to the planned facility, no actions are required on the part of Northeast Natural Energy to attain compliance. The various non-engine combustion units have a design heat input less than 10 MMBTU/Hr and are therefore exempt from the requirements of this rule.

### 1.7.5 45 CSR 13

The state regulations applicable to the permitting of the proposed construction are in Title 45 Series 13 of the Code of State Regulations. The proposed Yost Well Pad facility has the potential to emit a regulated pollutant in excess of the thresholds that define a Stationary Source (formaldehyde). Additionally, the presence of a source (the compressor engine) is regulated under NSPS, Subpart JJJJ. As such, a permit is warranted, independent of the exceedance (or lack thereof) of any emission thresholds triggering permitting.

When taking into consideration the voluntary limit to operate the engines equipped with catalysts only when the catalytic converters are properly functioning, the facility's potential to emit is less than the thresholds that would classify the facility as a Major Source under 45 CSR 14.

1.7.6 45 CSR 16

This series of regulations is an incorporation, by reference, of the New Source Performance Standards codified under 40 CFR 60. As discussed under the federal regulations, the Yost Well Pad Production Facility is subject to the emission limitations, monitoring, testing and recordkeeping of Subpart JJJJ. The facility is also subject to Subpart OOOO.

1.7.7 45 CSR 30

The state regulations applicable to Title V operating permits are in Title 45 Series 30. The planned Yost Well Pad Production Facility, as noted above, does not have the potential to emit any regulated pollutant about the threshold that would define it as a major facility. Additionally, although the facility is subject to certain New Source Performance Standards, the NSPS applicable to this facility do not trigger the need to submit a Title V application and obtain a Title V permit. Hence this rule is not applicable.

1.7.8 Other Applicable Requirements

Through Series 34, WVDEP has adopted the National Emission Standards for Hazardous Air Pollutants for Source Categories. Both of these topics have been addressed above.