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ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

Application No.:	R13-3098
Plant ID No.:	095-00031
Applicant:	Eureka Hunter Pipeline, LLC (Eureka)
Facility Name:	Twin Hickory Station
Location:	Wick, Tyler County
NAICS Code:	211112 (NGL Extraction)
Application Type:	Construction
Received Date:	June 27, 2013
Engineer Assigned:	Jerry Williams, P.E.
Fee Amount:	$2,000.00
Date Received:	June 27, 2013
Complete Date:	July 30, 2013
Due Date:	October 28, 2013
Applicant Ad Date:	July 3, 2013
Newspaper:	*Tyler Star News*
UTM's:	Easting: 504.40 km Northing: 4361.81 km Zone: 17
Description:	Installation of condensate and natural gas liquids (NGL) management equipment and natural gas compression/dehydration equipment.

DESCRIPTION OF PROCESS

The following process description was taken from Permit Application R13-3098:

The station is comprised of two (2) separate, but interconnected areas, functioning as a single facility. The two (2) areas are identified as the pig launcher/receiver area and the liquids management area. At the pig launcher/receiver area, liquids are received from low pressure natural gas gathering lines. These liquids, comprised primarily of condensed rich gas constituents, will be received from local production wells via pig receivers and associated slug catchers. Liquids will be routed to the liquids management area of the facility. Compression and dehydration equipment will also be located at the launcher/receiver area to take gas from the low pressure gathering line, compress, dehydrate and inject into a higher pressure gas gathering line. Compression and dehydration will have a capacity of 3.0 million standard cubic feet per day (mmscfd).

At the liquids management area, received liquids (condensate) will be processed through a stabilizer, gathering three (3) product streams: stabilized condensate, NGL, and separated natural gas. The gas is returned to the pig launcher/receiver and blended with the gas being injected into the higher pressure gathering line and to aid in pig launching. The NGL is route to pressure vessels, pending truck loading for transportation to an off-site processing facility. The stabilized condensate will be accumulated in three (3) atmospheric pressure tanks, again pending truck loading to an off-site processing facility.

Vapors emitted from the stabilized condensate tanks will be captured through a hard piping system and routed to a vapor recovery unit (VRU), where the vapors will be compressed and blended with the gases produced by the stabilizer and returned via pipeline to the launcher/receiver area where the gases will be compressed and injected into the higher pressure gathering line.

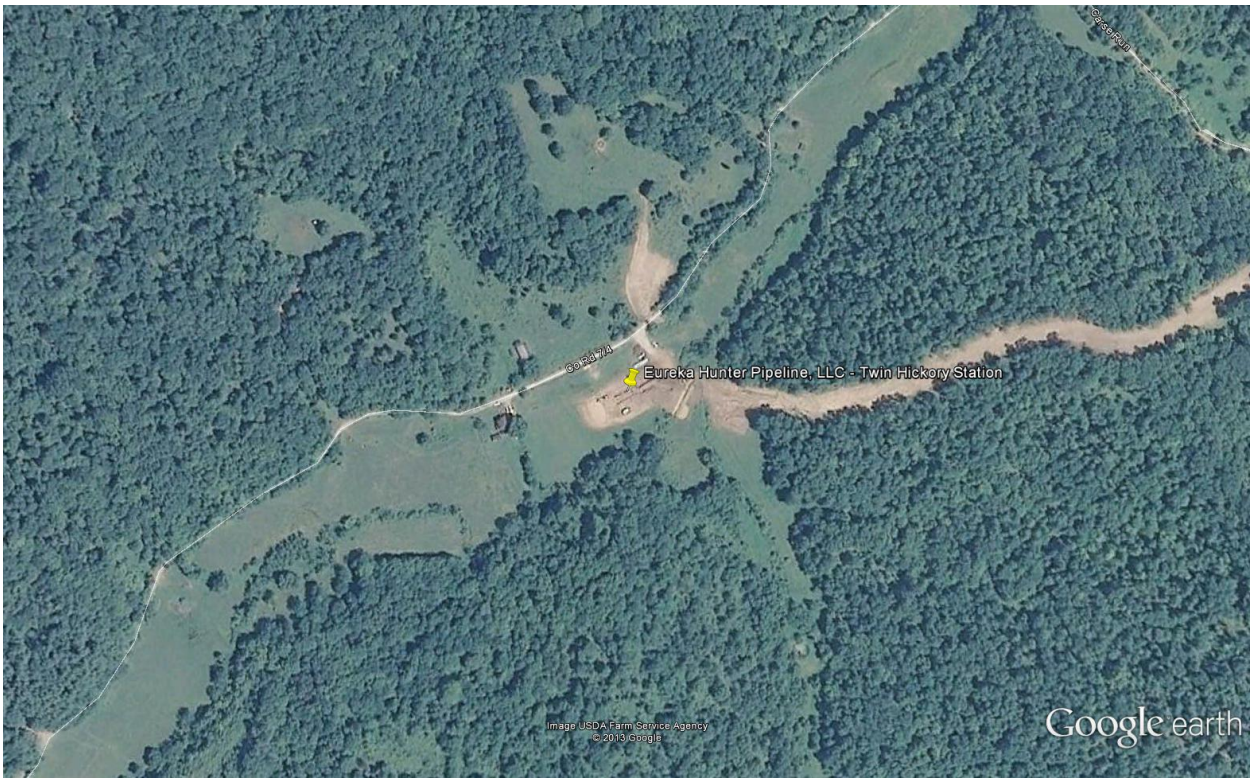
All natural gas fired equipment at the site will use natural gas received at the station as fuel.

SITE INSPECTION

A site inspection was conducted by Douglas Hammell of the DAQ Enforcement Section on July 12, 2013. Mr. Hammell stated that the site was an acceptable location and was approximately 975 feet to the closest residence.

Directions to the facility (Latitude: 39.405797, Longitude: -80.948894) as given in the permit application are as follows:

From New Martinsville: Proceed south on Route 2 to Bens Run. In Bens Run, turn left onto Arvilla Road (County Route 5). After 4 miles, turn right on Wick Road (County Road 7). Proceed on Wick Road 4.7 miles to the community of Meadville. Turn left in Meadville to stay on Wick Road. Proceed 0.7 miles and turn left again to stay on Wick Road. Proceed 1.7 miles to Wick. Continue through Wick approximately 0.8 miles to intersection with County Road 7/4 and turn right onto CR 7/4 (Twin Hickory Road). Proceed approximately 0.8 miles on CR 7/4. Entrance to site is on the right.



ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

Emissions associated with this construction application consist of the emissions from two (2) reciprocating internal combustion engines, one (1) glycol dehydration unit, one (1) glycol dehydration unit reboiler, one (1) stabilizer heater, two (2) NGL pressure vessels, three (3) condensate tanks, four (4) miscellaneous tanks, NGL and condensate loading, and fugitive emissions. The following table indicates which methodology was used in the emissions determination:

Emission Point ID#	Process Equipment	Calculation Methodology
1E	690 hp Caterpillar 3508B LE Compressor Engine equipped with Selective Catalytic Reduction (SCR)	Manufacturer's Data / EPA AP-42 Emission Factors
2E	276 hp Caterpillar 3406 TA Compressor Engine equipped with Non-Selective Catalytic Reduction (NSCR) (VRU Driver Engine)	Manufacturer's Data / EPA AP-42 Emission Factors
3E	3 mmscfd Glycol Dehydration Unit w/ Recycled Reboiler	GRI GlyCalc 4.0

3E	0.125 MMBTU/hr Glycol Dehydration Unit Reboiler	EPA AP-42 Emission Factors
4E	0.75 MMBTU/hr Stabilizer Heater	EPA AP-42 Emission Factors
--	NGL Pressure Vessels	No Emissions
T01 – T03	500 bbl (21,000 gal) Condensate Tanks	E & P Tanks
TL-1	NGL and Condensate Truck Loading	EPA AP-42 Emission Factors
T04 – T07	300 gal Miscellaneous Tanks (Engine Coolant, Lube Oil, Used Oil, TEG)	Negligible Emissions

The following table indicates the control device efficiencies that are required for this facility:

Emission Unit	Pollutant	Control Device	Control Efficiency
690 hp Caterpillar 3508B LE RICE w/ SCR (1E)	Carbon Monoxide	SCR	85 %
	Volatile Organic Compounds		80 %
	Formaldehyde		80 %
276 hp Caterpillar 3406 TA RICE w/ SCR (2E)	Nitrogen Oxides	NSCR	88 %
	Carbon Monoxide		88 %
3 mmscfd TEG Dehydrator Still Vent (3E)	Volatile Organic Compounds	Combustion Recycle	98 %
	Hazardous Air Pollutants		98 %
Product Tanks (T-01 – T-03)	Volatile Organic Compounds	Vapor Recovery Unit	98 %
	Hazardous Air Pollutants		98 %
NGL and Condensate Truck Loading (TL-1)	Volatile Organic Compounds	Vapor Recovery Unit	97.7 % (98.7% capture (NSPS leak tested), 99% control)
	Hazardous Air Pollutants		

Fugitive emissions for the facility are based on emission factors from 40CFR98 and the American Petroleum Institute Compendium of Greenhouse Gas Emissions Methodologies for the Oil and Gas Industry. The factors presented in the API Compendium are for methane emissions. Therefore, the fugitive VOC and HAP emissions were calculated using a representative gas analysis and the weight percent of each respective pollutant.

The total facility PTE for the Twin Hickory Station is shown in the following table:

Pollutant	Facility Wide PTE (tons/year)
Nitrogen Oxides	9.00
Carbon Monoxide	8.49
Volatile Organic Compounds	30.66
Particulate Matter-10/2.5	0.11
Sulfur Dioxide	0.02
Total HAPs	2.77
Carbon Dioxide Equivalent	5,561

Maximum detailed controlled point source emissions were calculated by Eureka and checked for accuracy by the writer and are summarized in the table on the next page.

Eureka Hunter, LLC – Twin Hickory Station (R13-3098)

Emission	Source	NO_x		CO		VOC		PM-10/2.5		SO_2		Formaldehyde		Total HAPs		CO_2e	
Point ID#		lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year
1E	Compressor Engine	0.76	3.33	0.66	2.88	0.35	1.53	<0.01	<0.01	<0.01	0.01	0.10	0.40	0.20	0.86	843	3690
2E	Compressor Engine	1.22	5.33	1.22	5.33	0.27	1.20	0.02	0.09	<0.01	<0.01	0.17	0.72	0.19	0.82	292	1277
3E	Glycol Dehydration Unit Still Vent	0.00	0.00	0.00	0.00	1.37	5.98	0.00	0.00	0.00	0.00	0.00	0.00	0.20	0.86	4	16
3E	Glycol Dehydration Unit Reboiler	0.02	0.05	0.01	0.04	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	0.00	0.00	<0.01	<0.01	13	57
4E	Stabilizer Heater	0.07	0.29	0.06	0.24	<0.01	0.02	<0.01	0.02	0.00	0.00	<0.01	<0.01	<0.01	<0.01	78	341
T01-T03	Condensate Tanks	0.00	0.00	0.00	0.00	NA	14.79	0.00	0.00	0.00	0.00	0.00	0.00	NA	0.10	1	3
TL-1	Truck Loading	0.00	0.00	0.00	0.00	3.37	2.85	0.00	0.00	0.00	0.00	0.00	0.00	0.05	0.03	0	0
-	Pigging and Blowdowns	0.00	0.00	0.00	0.00	NA	1.65	0.00	0.00	0.00	0.00	0.00	0.00	NA	0.07	NA	107
FUG	Fugitive Emissions	0.00	0.00	0.00	0.00	0.63	2.64	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.03	NA	69
Total	**Total Facility PTE**	**2.07**	**9.00**	**1.95**	**8.49**	**NA**	**30.66**	**0.02**	**0.11**	**0.01**	**0.02**	**0.27**	**1.12**	**NA**	**2.77**	**1231**	**5561**

REGULATORY APPLICABILITY

The following rules apply to the facility:

45CSR2 (Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers)

The purpose of 45CSR2 (Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers) is to establish emission limitations for smoke and particulate matter which are discharged from fuel burning units.

45CSR2 states that any fuel burning unit that has a heat input under ten (10) million B.T.U.'s per hour is exempt from sections 4 (weight emission standard), 5 (control of fugitive particulate matter), 6 (registration), 8 (testing, monitoring, recordkeeping, reporting) and 9 (startups, shutdowns, malfunctions). However, failure to attain acceptable air quality in parts of some urban areas may require the mandatory control of these sources at a later date.

The individual heat input of the proposed fuel burning unit is below 10 MMBTU/hr. Therefore, this unit is exempt from the aforementioned sections of 45CSR2. However, Eureka would be subject to the opacity requirements in 45CSR2, which is 10% opacity based on a six minute block average.

Emission Unit ID#	Emission Unit	Design Capacity
HTR-1	Stabilizer Heater	0.75 MMBTU/hr
RBR-1	Glycol Dehydration Reboiler	0.125 MMBTU/hr

45CSR10 (To Prevent and Control Air Pollution from the Emissions of Sulfur Oxides)

45CSR10 states that any fuel burning unit that has a heat input under ten (10) million B.T.U.'s per hour is exempt from sections 3 (weight emission standard), 6 (registration), 7 (permits), and 8 (testing, monitoring, recordkeeping, reporting). However, failure to attain acceptable air quality in parts of some urban areas may require the mandatory control of these sources at a later date.

The individual heat input of the proposed fuel burning unit is below 10 MMBTU/hr. Therefore, this unit is exempt from the aforementioned sections of 45CSR10. Furthermore, 45CSR10A exempts fuel burning units that combust natural gas from testing and monitoring requirements.

Emission Unit ID#	Emission Unit	Design Capacity
HTR-1	Stabilizer Heater	0.75 MMBTU/hr
RBR-1	Glycol Dehydration Reboiler	0.125 MMBTU/hr

45CSR13 (Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, and Procedures for Evaluation)

45CSR13 applies to this source due to the fact that Eureka is defined as a "stationary source" under 45CSR13 Section 2.24.b, which states that an owner or operator discharges or has the potential to discharge more than six (6) pounds per hour and ten (10) tons per year, or has the potential to discharge more than 144 pounds per calendar day of any regulated air pollutant. Eureka has published the required Class I legal advertisement notifying the public of their permit application, and paid the appropriate application fee (construction).

45CSR16 (Standards of Performance for New Stationary Sources Pursuant to 40 CFR Part 60)

45CSR16 applies to this source by reference of 40CFR60, Subparts JJJJ and OOOO. Eureka is subject to the recordkeeping, monitoring, and testing required by 40CFR60 Subparts JJJJ and OOOO.

45CSR22 (Air Quality Management Fee Program)

Eureka is not subject to 45CSR30. The Twin Hickory Station is subject to 40CFR60 Subparts JJJJ and OOOO, however, they are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, provided they are not required to obtain a permit for a reason other than their status as an area source.

Eureka is required to pay the appropriate annual fees and keep their Certificate to Operate current.

40CFR60 Subpart Kb (Standards of Performance for VOC Liquid Storage Vessels)

The affected facility to which this subpart applies is each storage vessel with a capacity greater than or equal to 75 cubic meters (m^3) (19,813 gallons) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984. This subpart does not apply to storage vessels with a capacity greater than or equal to 151 m^3 storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa) or with a capacity greater than or equal to 75 m^3 but less than 151 m^3 storing a liquid with a maximum true vapor pressure less than 15.0 kPa. This subpart also does not apply to pressure vessels designed to operate in excess of 204.9 kPa and without emissions to the atmosphere. The only tanks that Eureka has proposed to install that exceed this size are the 21,000 gallon (79.49 cubic meter) condensate tanks. Therefore, Eureka would be subject to this rule. These tanks will have a closed vent system and vapors will be sent to the vapor recovery unit.

40CFR60 Subpart JJJJ (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (SI ICE))

40CFR60 Subpart JJJJ establishes emission standards for applicable SI ICE. The proposed engines (1E, 2E) are subject to this rule based on engine manufacturer date.

The proposed 690 hp compressor engine will be subject to the following emission standards:

Pollutant	Emission Standard (g/hp-hr)	Corresponding Emission Limit (lb/hr)
Nitrogen Oxides	1.0	1.52
Carbon Monoxide	2.0	3.04
Volatile Organic Compounds	0.7	1.06

The proposed 276 hp compressor engine will be subject to the following emission standards:

Pollutant	Emission Standard (g/hp-hr)	Corresponding Emission Limit (lb/hr)
Nitrogen Oxides	2.0	1.22
Carbon Monoxide	4.0	2.44
Volatile Organic Compounds	1.0	0.61

The proposed engines meet these standards.

Because these engines will not be certified by the manufacturer, Eureka will be required to perform an initial performance test within 180 days from startup, and subsequent testing every 8,760 hours or 3 years, whichever comes first.

40CFR60 Subpart OOOO (Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution)

EPA published in the Federal Register new source performance standards (NSPS) and air toxics rules for the oil and gas sector on August 16, 2012. 40CFR60 Subpart OOOO establishes emission standards and compliance schedules for the control of volatile organic compounds (VOC) and sulfur dioxide (SO_2) emissions from affected facilities that commence construction, modification or reconstruction after August 23, 2011. The following affected sources which commence construction, modification or reconstruction after August 23, 2011 are subject to the applicable provisions of this subpart:

a. Each gas well affected facility, which is a single natural gas well.

There are no gas wells at this facility. Therefore, all requirements regarding gas well affected facilities under 40 CFR 60 Subpart OOOO would not apply.

b. Each centrifugal compressor affected facility, which is a single centrifugal compressor using wet seals that is located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment. For the purposes of this subpart, your centrifugal compressor is considered to have commenced construction on the date the compressor is installed (excluding relocation) at the facility. A centrifugal compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.

There are no centrifugal compressors at the Twin Hickory Station. Therefore, all requirements regarding centrifugal compressors under 40 CFR 60 Subpart OOOO would not apply.

c. Each reciprocating compressor affected facility, which is a single reciprocating compressor located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment. For the purposes of this subpart, your reciprocating compressor is considered to have commenced construction on the date the compressor is installed (excluding relocation) at the facility. A reciprocating compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.

There are reciprocating internal combustion engines located at the Twin Hickory Station that were constructed after August 23, 2011. Therefore, the requirements regarding reciprocating compressors under 40 CFR 60 Subpart OOOO would apply. Eureka would be required to perform the following:

- Replace the reciprocating compressor rod packing at least every 26,000 hours of operation or 36 months.
- Demonstrate initial compliance by continuously monitoring the number of hours of operation or track the number of months since the last rod packing replacement.
- Submit the appropriate start up notifications.
- Submit the initial annual report for the reciprocating compressors.
- Maintain records of hours of operation since last rod packing replacement, records of the date and time of each rod packing replacement, and records of deviations in cases where the reciprocating compressor was not operated in compliance.

d. Pneumatic Controllers

- Each pneumatic controller affected facility, which is a single continuous bleed natural gas-driven pneumatic controller operating at a natural gas bleed rate greater than 6 scfh which commenced construction after August 23, 2011, and is located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment and not located at a natural gas processing plant.

- Each pneumatic controller affected facility, which is a single continuous bleed natural gas-driven pneumatic controller which commenced construction after August 23, 2011, and is located at a natural gas processing plant.

There are no applicable pneumatic controllers with natural gas bleed rates greater than 6 scfh which commenced construction after August 23, 2011. Therefore, all requirements regarding applicable pneumatic controllers under 40 CFR 60 Subpart OOOO would not apply.

e. Each storage vessel affected facility, which is a single storage vessel, located in the oil and natural gas production segment, natural gas processing segment or natural gas transmission and storage segment.

40CFR60 Subpart OOOO defines a storage vessel as a unit that is constructed primarily of nonearthen materials (such as wood, concrete, steel, fiberglass, or plastic) which provides structural support and is designed to contain an accumulation of liquids or other materials. The following are not considered storage vessels:

- Vessels that are skid-mounted or permanently attached to something that is mobile (such as trucks, railcars, barges or ships), and are intended to be located at a site for less than 180 consecutive days. If the source does not keep or are not able to produce records, as required by §60.5420(c)(5)(iv), showing that the vessel has been located at a site for less than 180 consecutive days, the vessel described herein is considered to be a storage vessel since the original vessel was first located at the site.

- Process vessels such as surge control vessels, bottoms receivers or knockout vessels.

- Pressure vessels designed to operate in excess of 204.9 kilopascals and without emissions to the atmosphere.

This rule requires that the permittee determine the VOC emission rate for each storage vessel affected facility utilizing a generally accepted model or calculation methodology within 30 days of startup, and minimize emissions to the extent practicable during the 30 day period using good engineering practices. For each storage vessel affected facility that emits more than 6 tpy of VOC, the permittee

must reduce VOC emissions by 95% or greater within 60 days of startup. The compliance date for applicable storage vessels is October 15, 2013.

The storage vessels located at the Twin Hickory Station are controlled by a vapor combustor and emit less than 6 tpy of VOC. Therefore, Eureka is not required by this section to reduce VOC emissions by 95%.

f. The group of all equipment, except compressors, within a process unit is an affected facility.

- Addition or replacement of equipment for the purpose of process improvement that is accomplished without a capital expenditure shall not by itself be considered a modification under this subpart.

- Equipment associated with a compressor station, dehydration unit, sweetening unit, underground storage vessel, field gas gathering system, or liquefied natural gas unit is covered by §§60.5400, 60.5401, 60.5402, 60.5421 and 60.5422 of this subpart if it is located at an onshore natural gas processing plant. Equipment not located at the onshore natural gas processing plant site is exempt from the provisions of §§60.5400, 60.5401, 60.5402, 60.5421 and 60.5422 of this subpart.

- The equipment within a process unit of an affected facility located at onshore natural gas processing plants and described in paragraph (f) of this section are exempt from this subpart if they are subject to and controlled according to subparts VVa, GGG or GGGa of this part.

The Twin Hickory Station is not a natural gas processing plant. Therefore, Leak Detection and Repair (LDAR) requirements for onshore natural gas processing plants would not apply.

g. Sweetening units located at onshore natural gas processing plants that process natural gas produced from either onshore or offshore wells.

- Each sweetening unit that processes natural gas is an affected facility; and

- Each sweetening unit that processes natural gas followed by a sulfur recovery unit is an affected facility.

- Facilities that have a design capacity less than 2 long tons per day (LT/D) of hydrogen sulfide (H_2S) in the acid gas (expressed as sulfur) are required to comply with recordkeeping and reporting requirements specified in §60.5423(c) but are not required to comply with §§60.5405 through 60.5407 and paragraphs 60.5410(g) and 60.5415(g) of this subpart.

- Sweetening facilities producing acid gas that is completely reinjected into oil-or-gas-bearing geologic strata or that is otherwise not released to the

atmosphere are not subject to §§60.5405 through 60.5407, 60.5410(g), 60.5415(g), and 60.5423 of this subpart.

There are no sweetening units at the Twin Hickory Station. Therefore, all requirements regarding sweetening units under 40 CFR 60 Subpart OOOO would not apply.

40CFR63 Subpart HH (National Emission Standards for Hazardous Air Pollutants for Oil and Natural Gas Production Facilities)

Subpart HH establishes national emission limitations and operating limitations for HAPs emitted from oil and natural gas production facilities located at major and area sources of HAP emissions. The glycol dehydration unit at the Twin Hickory Station is subject to the area source requirements for glycol dehydration units. However, because the facility is an area source of HAP emissions and the actual average benzene emissions from the glycol dehydration unit is below 0.90 megagram per year (1.0 tons/year) it is exempt from all requirements of Subpart HH except to maintain records of actual average flowrate of natural gas to demonstrate a continuous exemption status.

40CFR63 Subpart ZZZZ (National Emission Standards for Reciprocating Ignition Internal Combustion Engines)

Subpart ZZZZ establishes national emission limitations and operating limitations for HAPs emitted from stationary RICE located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations. The engines (1E, 2E) at the Twin Hickory Station are subject to the area source requirements for non-emergency spark ignition engines.

The applicability requirements for new stationary RICEs located at an area source of HAPs, is the requirement to meet the standards of 40CFR60 Subpart JJJJ. These requirements were outlined above. The proposed engines meet these standards.

Because these engines will not be certified by the manufacturer, Eureka will be required to perform an initial performance test within 180 days from startup, and subsequent testing every 8,760 hours or 3 years, whichever comes first.

The following rules do not apply to the facility:

40CFR60 Subpart KKK (Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants)

40CFR60 Subpart KKK applies to onshore natural gas processing plants that commenced construction after January 20, 1984, and on or Before August 23, 2011. The Twin Hickory Station is not a natural gas processing plant, therefore, Eureka would not be subject to this rule.

45CSR14 (Permits for Construction and Major Modification of Major Stationary Sources of Air Pollutants)

45CSR19 (Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution which Cause or Contribute to Nonattainment)

The Twin Hickory Station is located in Tyler County, which is an attainment county for all pollutants, therefore this facility is not applicable to 45CSR19.

As shown in the table below, Eureka is not subject to 45CSR14 or 45CSR19 review.

Pollutant	**PSD (45CSR14) Threshold (tpy)**	**NANSR (45CSR19) Threshold (tpy)**	**Twin Hickory PTE (tpy)**	**45CSR14 or 45CSR19 Review Required?**
Carbon Monoxide	250	NA	8.49	No
Nitrogen Oxides	250	NA	9.00	No
Sulfur Dioxide	250	NA	0.02	No
Particulate Matter 2.5	250	NA	0.11	No
Ozone (VOC)	250	NA	30.66	No
Greenhouse Gas (CO_2e)	100,000	NA	5,561	No

TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

There will be small amounts of various non-criteria regulated pollutants emitted from the combustion of natural gas. However, due to the concentrations emitted, detailed toxicological information is not included in this evaluation.

AIR QUALITY IMPACT ANALYSIS

Modeling was not required of this source due to the fact that the facility is not subject to 45CSR14 (Permits for Construction and Major Modification of Major Stationary Sources of Air Pollutants) as seen in the table listed in the Regulatory Discussion Section.

SOURCE AGGREGATION

"Building, structure, facility, or installation" is defined as all the pollutant emitting activities which belong to the same industrial grouping, are located on one or more contiguous and adjacent properties, and are under the control of the same person.

The Twin Hickory Station will receive, compress, and dehydrate raw natural gas from regional well pads owned and operated by others. In addition, it will receive and stabilize condensate from these same wells. The nearest well pad is approximately 0.5 miles from this facility. Compressed and dehydrated natural gas will then be discharged into gathering lines owned by others for transportation to a regional natural gas processing plant.

1. The Twin Hickory Station and area well pads both will operate under SIC code 13 (Natural Gas Liquid Extraction). Therefore, these facilities do belong to the same industrial grouping.

2. The Twin Hickory Station and area well pads are owned and operated by different corporate entities and do not share work forces.

3. The Twin Hickory Station is not contiguous or adjacent with the area well pads.

Because the Twin Hickory Station and the area well pads are not under common control and are not contiguous or adjacent, the emissions from the Twin Hickory Station should not be aggregated with other facilities in determining major source or PSD status.

MONITORING OF OPERATIONS

Eureka will be required to perform the following monitoring and recordkeeping associated with this permit application:

1. Monitor and record quantity of natural gas consumed for all combustion sources.
2. Monitor visible emission opacity tests conducted per the permit.
3. Monitor and record quantity of gas throughput to the glycol dehydration unit.
4. Monitor the tanks to ensure that all vapors from the produced fluids tanks and the truck loading operation are sent to the vapor recovery unit.
5. Monitor the condensate truck loading to ensure that vapor return/combustion is used.
6. Maintain records of testing conducted in accordance with the permit. Said records shall be maintained on-site or in a readily accessible off-site location
7. Maintain the corresponding records specified by the on-going monitoring requirements of and testing requirements of the permit.
8. Maintain a record of all potential to emit (PTE) HAP calculations for the entire facility. These records shall include the natural gas compressor engines and ancillary equipment.
9. The records shall be maintained on site or in a readily available off-site location maintained by Eureka for a period of five (5) years.

RECOMMENDATION TO DIRECTOR

The information provided in the permit application indicates Eureka's Twin Hickory Station meets all the requirements of applicable regulations. Therefore, impact on the surrounding area should be minimized and it is recommended that this facility should be granted a 45CSR13 construction permit for their facility.

Jerry Williams, P.E.
Engineer

Date