

MEMO

To: Beverly McKeone  
From: Roy F. Kees, P.E.  
Date: August 26, 2015  
Re: Noble Energy, Inc.- Pennsboro 2 - 085-00052 - G70-A155A

Noble has applied for a Class I Administrative Update to current general permit registration G70-A155 to replace the existing Caterpillar G3508B rated at 690 horsepower with one Caterpillar G3406TA rated at 276 horsepower. The engine will serve the function in the process, with the proposed engine sized commensurate with production.

The replacement engine is equipped with an integral catalyst that is integral to the unit such that operation is precluded in the absence of a properly functioning catalyst. As such, the potential to emit has been calculated for this source based on post control values.

Also, the replacement engine was manufactured prior to June 12, 2006 with no subsequent overhauls triggering reconstruction or modification provisions of NSPS. The existing engine was subject to NSPS and registered as such, therefore the change of engines therefore does not add substantive requirements.

Since the changes will result in a decrease of emissions, it is the writers opinion that Noble be granted this Class I Administrative Update.