

ONEOK Rockies Midstream, L.L.C.
Antelope Compressor Station
Title V Permit to Operate No. AOP-28518 v1.1
Statement of Basis
(January 30, 2026)

Facility Background:

The ONEOK Rockies Midstream, L.L.C. (ONEOK), Antelope Compressor Station is located near New Town in McKenzie County, North Dakota. A pipeline gathering system transports field natural gas from nearby wells through an inlet separator where free liquids are removed and stored in condensate tanks. Natural gas then passes through a suction header and is routed to the compressors for increasing the pressure for transmission within the pipeline. The condensate is transported off-site via truck for sale. The predominant sources of air emissions are from the six natural gas-fired compressor engines, approximately 14 tanks and low pressure flare.

Chronology of significant events (not all-inclusive):

July 26, 2019 - Permit to Construct (PTC) No. PTC18045 (ACP-17901 v1.0) was issued to ONEOK for the construction and initial operation of the Antelope Compressor Station.

April 1, 2021 - An amended PTC (ACP-17901 v1.1) was issued for updated potential to emit (PTE) calculations on carbon monoxide (CO) and volatile organic compound (VOC) emissions. The changes triggered the requirement to obtain a Title V operating permit based on VOC potential emissions.

March 15, 2023 - The initial Title V Permit to Operation (PTO) was issued.

October 28, 2024 - ACP-18250 v1.0 was issued for the construction of a low pressure flare and updated, streamlined emission limits for existing units.

Current Action:

On December 1, 2025 the Department received a timely application through CERIS-ND from ONEOK for a revised Title V permit for the Antelope Compressor Station, Title V PTO No. AOP-28518. The draft, permit incorporates ACP-18250 v1.0, along with administrative updates.

The Department proposes to issue Title V Permit to Operate No. AOP-28518 v1.1 after the required 30-day public comment period and subsequent 45-day EPA review period of the draft permit. This statement of basis summarizes the relevant information considered during the issuance of the Title V permit. The legal basis for each permit condition is stated in the draft permit under the heading of "Applicable Requirement."

Applicable Programs/As-Needed Topics:

1. **Title V.** The facility requires a Title V Permit to Operate because potential annual VOC emissions exceed the 100 tons per year (tpy) major source threshold. The facility is

considered a minor/area source of Hazardous Air Pollutant (HAP) emissions because individual and combined potential annual HAP emissions are below 10 tpy and 25 tpy, respectively. A potential to emit table is provided on the last page of this document.

2. **New Source Performance Standards (NSPS).** The following NDAC 33.1-15-12-02 and 40 CFR 60 subparts apply to the facility.

Subpart A, General Provisions, applies to all source units to which another NSPS subpart applies.

Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (EU C-1 through C-6).

Subpart OOOOa, Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015 (EU C-1 through C-6 reciprocating compressors and FUG).

Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels, does not apply to the volatile organic liquids tanks because their capacities are less than 75 cubic meters each.

3. **National Emission Standards for Hazardous Air Pollutants (NESHAP).** No NDAC 33.1-15-13 and 40 CFR 61 subparts apply to the facility, with the possible exception of NDAC 33.1-15-13-02 (40 CFR 61) Subpart M (National Emission Standard for Asbestos), which may apply during facility modifications involving asbestos.

4. **NESHAP/Maximum Achievable Control Technology (MACT).** The following NDAC 33.1-15-22-03 and 40 CFR 63 subparts apply to the facility, which is an area source of HAP emissions.

Subpart A, General Provisions, applies to all source units to which another MACT subpart applies.

Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, applies to the engines (EU C-1 through C-6). As an area source of HAPs, compliance with this subpart is achieved through compliance with Subpart JJJJ. North Dakota has not adopted the area source provisions of this subpart; all required reports and documentation are to be provided to EPA Region 8.

5. **Acid Rain.** NDAC 33.1-15-21 (40 CFR 72, 73, 75 and 76) does not apply to the facility since the plant is not an existing electric utility steam generating plant rated at greater than 25 MWe.

6. **Prevention of Significant Deterioration (PSD).** The facility is not a major source under NDAC 33.1-15-15 (40 CFR 52) because it does not have the potential to emit more than

250 tons of any criteria pollutant per year; therefore, this permit is not subject to PSD review.

7. **BACT.** Since the facility is not a major PSD source and does not contain changes that increase the potential emissions by a PSD-significant amount, a BACT review is not required for this permit.
8. **Gap Filling.** This permit contains gap filling for testing, monitoring or recordkeeping not otherwise required by rule. The gap filling conditions are generally identified by the applicable requirement NDAC 33.1-15-14-06.5.a(3)(a).
9. **Streamlining Decisions.** The NDAC 33.1-15-06-01.2 *Restrictions applicable to fuel burning installations* emission limit for sulfur (3.0 lb sulfur per million Btu) was streamlined because the standard ND natural gas fuel restriction for sulfur (2 grains per 100 scf) is more stringent.
10. **Compliance Assurance Monitoring (CAM).** CAM does not apply because adequate monitoring is specified in post-11/15/90 NSPS and NESHAP/MACT regulations and no controlled units have an uncontrolled potential to emit (PTE) of ≥ 100 tpy of any EPA regulated criteria or uncontrolled PTE of ≥ 10 tpy individual and ≥ 25 tpy combined HAP pollutant(s).
11. **Permit Shield.** Does not apply because the permit to operate does not contain a permit shield.
12. **New Conditions/Limits.** This draft permit contains new emission limits and conditions associated with the incorporation of construction permit ACP-18250 v1.0. Specific modifications are identified in the "Permit Changes by Section" below.
13. **40 CFR 98 - Mandatory Greenhouse Gas Reporting.** This rule requires sources above certain emission thresholds or in certain supplier thresholds to calculate, monitor and report greenhouse gas emissions. According to the definition of "applicable requirement" in 40 CFR 70.2, neither Subpart 98, nor Clean Air Act Section 307(d)(1)(V), the CAA authority under which Subpart 98 was promulgated, are listed as applicable requirements for the purpose of Title V permitting. Although the rule is not an applicable requirement under 40 CFR 70, the source is not relieved from the requirement to comply with the rule separately from compliance with their Part 70 operating permit. It is the responsibility of each source to determine applicability to the subpart and to comply, if necessary.

Permit Changes by Section:

Note: Administrative changes were made to some sections of the permit to update to the current North Dakota (ND) format and to correct errors. These changes may not be specifically addressed below.

Cover: The permit version number was updated.

Table of Contents: Page numbers were updated as necessary.

1. **Emission Unit Identification:** Emission units descriptions was updated for clarification. Per ACP-18250 v1.0, the low pressure flare (EU FL-2) was added and the emergency/process flare (EU FL-1) was removed.
2. **Applicable Standards and Miscellaneous Conditions:** Applicable requirements were updated to include ACP-18250 v1.0. Best management practices was added per ACP-18250 v1.0 and VRU and CVS requirements were added for storage vessel control per the standard language for those controlling emission to stay out of 40 CFR 60, Subpart OOOOa applicability.
3. **Emission Unit Limits:** Per ACP-18250 v1.0, existing emission units' emission limits were updated (EU C-1 through C-6), the low pressure flare (EU FL-2) and condensate tanks (EU T-1 through T-10) were added, and the emergency/process flare (EU FL-1) was removed from Table 3.1.
4. **Monitoring Requirements and Conditions:** Monitoring was added for the low pressure flare (EU FL-2) and condensate tanks (EU T-1 through T-10) and removed for the emergency/process flare (EU FL-1). The visible emissions observations condition was updated to the current ND standard.
5. **Recordkeeping Requirements:** Recordkeeping was added for the low pressure flare (EU FL-2) and condensate tanks (EU T-1 through T-10) and removed for the emergency/process flare (EU FL-1).
6. **Reporting:** No change.
7. **Facility Wide Operating Conditions:** No change.
8. **General Conditions:** No change.
9. **State Enforceable Only Conditions (not Federally enforceable):** No change.

Comments/Recommendations:

It is recommended that Title V Permit to Operate No. AOP-28518 v1.1 be processed and considered for issuance following a 30-day public comment period and a subsequent 45-day EPA review period.

Facility-wide Potential Emissions ^A

Pollutant	Tons Per Year Without Fugitives	Tons Per Year With Fugitives
PM	4.1	4.1
PM₁₀	4.1	4.1
PM_{2.5}	4.1	4.1
SO₂	0.2	0.2
NO_x	96.2	96.2
CO	86.1	86.1
VOC	154.7	165.7
Total HAPs	16.7	17.9
Individual HAP (formaldehyde)	8.3	8.3

^A Based upon Title V revision application information submitted through CERIS-ND on 12/1/25. Additional emission unit/emission point specific potential emissions are provided in the revision application.