

## AIR POLLUTION CONTROL PERMIT TO CONSTRUCT

<b>Permittee Name:</b> ONEOK Rockies Midstream, LLC	<b>Permit Number:</b> ACP-18331 v1.0
<b>Permittee Address:</b> 100 West Fifth Street Tulsa, OK 74103	<b>Permit Description:</b> Synthetic Minor
<b>Source Name &amp; Location:</b> Cooperstown Compressor Station Lat/Long: 47.79, -103.73 SW ¼ SW ¼ Sec. 22, T150N, R102W McKenzie County	<b>Source Type:</b> Natural Gas Compressor Station
<b>Date of Application:</b>	December 29, 2025

Pursuant to Chapter 23.1-06 of the North Dakota Century Code, the North Dakota Air Pollution Control Rules (North Dakota Administrative Code [NDAC] 33.1-15), and in reliance on statements and representations heretofore made by the permittee (i.e., owner) designated above, a Permit to Construct (PTC, also referred to as ‘permit’) is hereby issued authorizing such permittee to construct and initially operate the source unit(s) listed in Condition 1 at the location designated above. The source may be operated under this PTC until a Permit to Operate (PTO) is issued. This PTC is subject to all applicable rules and orders now or hereafter in effect of the North Dakota Department of Environmental Quality (Department), state and federal regulations, and to any conditions specified below:

\_\_\_\_\_  
 James L. Semerad  
 Director  
 Division of Air Quality

Date: \_\_\_\_\_

## 1. Project and Facility Emission Units:

ACP-18331 v1.0\_AQEA details the facility wide emission profile and regulation analysis associated with this permit.

Table 1-1 lists the new emission unit associated with the Project. Table 1-2 lists all emission units associated with the facility upon Project completion.

*Table 1-1: Project Emission Units (new)*

<b>Emission Unit Description <sup>A</sup></b>	<b>Emission Unit (EU)</b>	<b>Emission Point (EP)</b>	<b>Air Pollution Control Equipment</b>
2,500 hp electrically driven compressor (NSPS OOOOa)	COMP-3	COMP-3	None

<sup>A</sup> All emission unit ratings are considered nominal ratings.

*Table 1-2: Facility Emission Units upon Project Completion*

<b>Emission Unit Description <sup>A</sup></b>	<b>Emission Unit (EU)</b>	<b>Emission Point (EP)</b>	<b>Air Pollution Control Equipment</b>
Two 1,500 hp electrically driven compressors	COMP-1, COMP-2 <sup>B,C</sup>	COMP-1, COMP-2	None
2,500 hp electrically driven compressor (NSPS OOOOa)	COMP-3 <sup>B,C</sup>	COMP-3	None
Two 400-bbl condensate tanks	TK-1, TK-2	COMBUST	Vapor combustion device
400-bbl produced water tank	WTK-1	COMBUST	Vapor combustion device
Vapor combustion device	COMBUST	COMBUST	N/A
200-bbl methanol tank	MTK-1 <sup>B</sup>	MTK-1	None
Emergency vapor combustion device	FL-1	FL-1	N/A
Condensate truck loading	TL-1	TL-1	Submerged Fill Arm (SFA)
Produced water truck loading	TL-2	TL-2	SFA
Fugitive emissions (NSPS OOOOb)	FUG <sup>B</sup>	FUG	Leak Detection and Repair Program (LDAR)
Miscellaneous vents and blowdowns	FUG-misc <sup>B,D</sup>	FUG-misc	None

<sup>A</sup> All emission unit ratings are considered nominal ratings.

<sup>B</sup> Insignificant or fugitive emission sources (no specific emission limit)

<sup>C</sup> Compressor blowdowns are routed to FL-1 for control.

<sup>D</sup> Miscellaneous venting and blowdowns to atmosphere include, but are not limited to, miscellaneous planned and unplanned venting to atmosphere from pressure relief valves, startup, shut-down, maintenance, compressor blowdowns, pigging actions, and/or pneumatic controllers.

## 2. **Applicable Standards, Restrictions and Miscellaneous Conditions:**

### A. New Source Performance Standards (NSPS):

The permittee shall comply with all applicable requirements of the following NSPS subparts, in addition to Subpart A, as referenced in NDAC 33.1-15-12 and Title 40 of the Code of Federal Regulations (CFR) Part 60.

- 1) 40 CFR 60, Subpart OOOOa – Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification, or Reconstruction Commenced After September 18, 2015, and on or Before December 5, 2022 (EU COMP-3).
- 2) 40 CFR 60, Subpart OOOOb – Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification, or Reconstruction Commenced After December 5, 2022 (EU FUG).

### B. Closed Vent System (CVS) Requirements:

- 1) Must be designed to collect and route all vapors from the storage vessels (EUs TK-1, TK-2, and WTK-1) to the control device (100% collection efficiency is assumed during normal operation).
- 2) Must be operated with no detectable emissions, as determined using auditory, visual, and olfactory inspections or optical gas imaging.
- 3) Must be monitored at the same intervals required by the facility Leak Detection and Repair (LDAR) program.
- 4) If the CVS contains a bypass, the permittee must track hours the bypass is open on a rolling 12-month period and either:
  - a) Secure the bypass in the non-diverting position using a car-seal or a lock-and-key configuration; or,
  - b) Install a flow indicator at the bypass inlet and maintain and operate it with an alarm system that notifies the nearest field office when the bypass opens and vapors are diverted away from the control device. Records of each time the alarm is activated must be maintained for a period of five (5) years.

### C. Vapor Combustion Device (VCD)<sup>1</sup> Requirements (EUs COMBUST and FL-1):

- 1) The process VCD (EU COMBUST) must be operated at all times when vapors are vented from the storage vessels (EUs TK-1, TK-2 and WTK-1) through the CVS to the VCD.

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<sup>1</sup> i.e., flare, combustor, or other functionally equivalent combustion control device.

- 2) The process VCD (EU COMBUST) must be operated with no visible emissions during normal operations, except for periods not to exceed a total of 1 minute during any 15-minute period.
- 3) Both VCDs must be equipped and operated with an automatic ignitor or a continuous burning pilot which must be maintained in good working order per NDAC 33.1-15-07-02.
  - a) Pilot flame presence must be monitored using a thermocouple or other equivalent device, and records of pilot flame outages and/or control device downtime must be maintained. If an automatic ignitor is used in lieu of a pilot, the ignitor must be monitored weekly by listening for the actuator to ensure that the ignitor is in operation.
- 4) For both VCDs, records of downtime must be kept on at least an hourly basis and averaged across a rolling 12-month period. Only hours in which potentially recoverable vapors are generated from any controlled storage vessel are considered in this period.
  - a) Sub-hourly downtime records must be converted to hourly, where any recorded downtime within the hour makes the whole hour to be considered down.
- 5) Both VCDs must be operated according to the manufacturer's specifications.
- 6) When operating the emergency VCD (EU FL-1), all precautions must be taken during emergency operation<sup>2</sup> to minimize emissions and maintain compliance with the applicable ambient air quality standards as outlined in NDAC 33.1-15-02 and the opacity standard of 20% not to exceed 60% for more than one six-minute period per hour.

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<sup>2</sup> Emissions from an emergency vapor blowdown system or emergency relief system are permitted under NDAC 33.1-15-07-02.

### 3. Emission Unit Limits:

Emission limits from the operation of the source unit(s) identified in Table 1-1 of this PTC are as follows in Table 3-1. Source units not listed are subject to the applicable emission limits specified in NDAC 33.1-15.

Table 3-1: Summary of Permit Emission Limits

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	Pollutant / Parameter	Emission Limit
2,500 hp electrically driven compressor (NSPS OOOOa)	COMP-3	COMP-3	VOC	Per NSPS, Subpart OOOOa
Two 400-bbl condensate tanks	TK-1, TK-2	COMBUST	VOC / Design & Operation	Condition 2.B, Condition 3.A
400-bbl produced water tank	WTK-1	COMBUST	VOC / Design & Operation	Condition 2.B, Condition 3.A
Vapor combustion device	COMBUST	COMBUST	Opacity	0% <sup>A</sup> / Condition 2.C
Emergency vapor combustion device	FL-1	FL-1	Opacity	20% <sup>B</sup> / Condition 2.C
Fugitive emissions (NSPS OOOOb)	FUG	FUG	LDAR	Per NSPS, Subpart OOOOb

<sup>A</sup> Except for periods not to exceed a total of one minute during any 15 minute period.

<sup>B</sup> 60% permissible for not more than one six-minute period per hour.

A. VOC emission restriction for storage vessel groupings (EUs TK-1 & TK-2); (EU WTK-1) (to remain non-affected facilities under NSPS OOOO):

- 1) Emissions are restricted to less than 6 tpy per storage vessel on a 12-month rolling basis.
- 2) Emissions must be calculated using records of monthly throughput and any model or calculation methodology for working, breathing, and flashing emissions that are generally accepted under NSPS OOOO. If individual storage vessel throughput information is not available or tracked, total throughput may be averaged across the storage vessels and applied to each individual storage vessel.
- 3) Records of monthly storage vessel throughput, emission calculations used to demonstrate compliance, and all periods of uncontrolled releases must be kept for a period of five (5) years.
- 4) Must calculate storage vessel emissions using the following equation:

### **Emissions calculations controlled by a VCD:**

$$VOC_{post} = VOC_{pre}(1 - DRE \cdot Uptime)$$

Where:

$VOC_{post}$  = VOC emissions in tpy, 12-month rolling average (post-control)

$VOC_{pre}$  = VOC emissions in tpy routed through the CVS (pre-control)

$DRE$  = destruction efficiency during uptime (98%)

$Uptime$  = hours that the VCD was operating normally with CVS bypass closed divided by the number of hours that vapors were generated, for the 12-month rolling period (ratio between 0 to 1)

#### **4. Emission Testing Requirements:**

The Department may require the permittee to conduct tests to determine the emission rate of air contaminants from the source. The Department may observe the testing and may specify testing methods to be used. A signed copy of the test results shall be furnished to the Department within 60 days of the test date. To facilitate preparing for and conducting such tests, and to facilitate reporting the test results to the Department, the permittee shall follow the procedures and formats in the Department's Emission Testing Guideline<sup>3</sup>.

*Applicable requirement: NDAC 33.1-15-01-12*

#### **5. General Conditions (Action Required):**

##### **A. Modification:**

Any alteration, repair, expansion, or change in the method or physical operation of the source which results in the emission of an additional type or greater amount of air contaminants, or which results in an increase in the ambient concentration of any air contaminant is considered a modification and must be reviewed and approved by the Department before implementation. The Department shall be notified 10 days in advance of any significant deviations from the application. The issuance of this PTC may be suspended or revoked if the Department determines that a significant deviation has been or is to be made without the proper review or approval.

*Applicable requirement: NDAC 33.1-15-14-02.9.d*

##### **B. Like-Kind Emission Unit Replacement:**

This permit allows the permittee to replace an existing emission unit with a like-kind unit. Replacement is subject to the following conditions:

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<sup>3</sup> See February 7, 2020, NDDEQ Division of Air Quality Emission Testing Guidelines: [https://www.deq.nd.gov/publications/AQ/policy/PC/Emission\\_Testing\\_Guide.pdf](https://www.deq.nd.gov/publications/AQ/policy/PC/Emission_Testing_Guide.pdf)

- 1) The replacement unit is subject to the same emission limits and performance testing requirements—both state and federal—as the existing unit. The facility must comply with any additional federal standards (e.g. NSPS, MACT) triggered by the replacement.
- 2) The Department must be notified within 10 days of replacement. The date of manufacture of the replacement unit and any additional federal applicability must be included in the notification.
- 3) The replacement unit shall operate in the same manner without increasing throughput and have equal or less emissions than the unit it is replacing.

*Applicable requirement: NDAC 33.1-15-14-02.9.d*

C. Annual Emission Inventory/Annual Production Reports:

The permittee shall submit an annual emission inventory report and/or an annual production report upon Department request on forms approved by the Department.

*Applicable requirement: NDAC 33.1-15-14-02.9.d*

D. Malfunction Notification:

The permittee shall notify the Department of any malfunction which can be expected to last longer than 24 hours and can cause the emission of air contaminants in violation of applicable rules and regulations. Using empirical estimates of emission rates, the permittee shall conservatively estimate if the malfunction can cause noncompliance.

*Applicable requirement: NDAC 33.1-15-01-13.2.a*

E. Transfer of Permit to Construct:

The holder of a PTC may not transfer such permit without prior approval from the Department.

*Applicable requirement: NDAC 33.1-15-14-02.11*

**6. General Conditions (Obligations):**

A. Construction:

This permit shall become invalid if installation of the new electrically driven compressor (EU COMP-3) does not commence within 18 months after permit issuance, construction is discontinued for a period of 18 months or more, or construction is not completed within a reasonable time as determined by the Department. The Department may provide a time period greater than 18 months when such extension is supported by sufficient documentation from the applicant.

*Applicable requirement: NDAC 33.1-15-14-02.10.b*

B. Operation:

Installation of the new electric compressor engine (EU COMP-3) and operation of the facility shall be in accordance with the permit application—which includes technical supplements, revisions, and supporting data. Any operations not listed in this permit are subject to all applicable NDAC 33.1-15 requirements. At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate any affected facility—including associated air pollution control equipment—in a manner consistent with good practice for minimizing emissions.

*Applicable requirements: NDAC 33.1-15-12, NDAC 33.1-15-22*

C. Recordkeeping:

The permittee shall maintain any compliance monitoring records required by this permit or applicable requirements for a period of at least five years (unless otherwise stated) from the date of the monitoring sample, measurement, report or application. Support information may include all calibration and maintenance records, all original strip-chart recordings and computer printouts for continuous monitoring instrumentation, and copies of all reports required by the permit.

*Applicable requirements: NDAC 33.1-15-14-02.9.d*

D. Control of Organic Compound Emissions:

The permittee shall comply with all applicable requirements of NDAC 33.1-15-07, which establishes requirements for the construction of organic compound facilities related to closed-vent systems, control devices, and seals and for the control of VOC vapors using a continuously burning pilot flare or other equally effective control device.

E. Internal Combustion Engine Emissions Restricted:

The permittee shall comply with all applicable requirements of NDAC 33.1-15-08-01, which restricts the operation of internal combustion engines which emit, from any source, unreasonable and excessive smoke, obnoxious or noxious gas, fumes or vapor.

F. Restriction of Fugitive Emissions:

The release of fugitive emissions shall comply with the applicable requirements in NDAC 33.1-15-17, which restricts particulate matter and gaseous fugitive emissions that would violate other regulations.

G. Permit Invalidation:

This permit shall be effective from the date of its issuance unless suspended, revoked or surrendered. The violation of any condition of this permit may result in revocation or suspension of the permit or other appropriate enforcement action. If any provision or application of a provision of this permit is held invalid in any circumstance, the remainder of this permit shall remain valid.

*Applicable requirement: NDAC 33.1-15-14-02.9*

H. Nuisance or Danger:

This permit shall in no way authorize the maintenance of a nuisance or a danger to public health or safety.

*Applicable requirements: NDAC 33.1-15-02-03, NDAC 33.1-15-14-02.9.c*

I. Right of Entry:

Any duly authorized officer, employee, or agent of the Department may enter and inspect any property, premise, or place at which the source is located at any time for the purpose of ascertaining compliance with NDAC 33.1-15. The Department may inspect monitoring equipment, conduct tests, and take samples of air contaminants, fuel, processing material, and other materials, which affect or may affect the emission of air contaminants from any source. The Department shall have the right to access and copy any records required by the Department.

*Applicable requirement: NDAC 33.1-15-01-06, NDCC 23.1-06-11*

**7. State Enforceable Conditions (Not Federally Enforceable):**

A. Emissions of Odorous Substances Restricted:

The permittee shall not discharge into the ambient air any objectionable odorous air contaminant which measures seven odor concentration units or greater.

*Applicable requirement: NDAC 33.1-15-16*