MEMO TO : File
Argent Midstream Solutions, LLC
County Line Gas Plant
Williams County

FROM : David Stroh
Permit Program Manager
Division of Air Quality

RE : ACP- 18330 v1.0

DATE : April 24, 2026

Argent Midstream Solutions, LLC (Argent) submitted a permit to construct application to the North Dakota Department of Environmental Quality – Division of Air Quality (Department) on January 23, 2026. Additional information containing catalyst specification sheets and updated facility emissions calculations were submitted on March 19, 2026. The application was for the construction of additional units and modifications to current units at the existing County Line Gas Plant (or facility) located in Williams County, North Dakota.

County Line Gas Plant currently operates under Air Permit to Operate No. AOP-28026 v2.0, which expires on October 15, 2027.

Argent requested the addition of a new natural gas fired compressor engine (EU ENG-4) and 2 electric compressors (EU EC-3 & EC-4).

There are no other regulatory changes associated with this permit action.

ACP-18330 v1.0 Table 1-1 lists the emissions units added with the Project.

ACP-18330 v1.0 Table 1-2 lists all the emissions units at County Line Gas Plant upon Project completion.

As shown in Table 1 (page 3), the facility wide PTE is below 100 tons per year (tpy) for all criteria air pollutants, below 10 tpy for any single hazardous air pollutant (HAP), and below 25 tpy for the combined HAP emissions. Detailed calculations have been provided in the permit application received on January 23, 2026, and updated on March 19, 2026. The Department has reviewed these calculations and believes they accurately represent the proposed facility operations. Slight modifications, including the use of rich-burn HAP AP-42 emission factors for ENG-3 and lowering of fuel gas heating value to 1020 BTU/scf were incorporated by the Department.

The facility PTE is based on enforceable emissions restrictions put in place on the Project natural gas compressor engine, limiting the allowable amount of NO_X and CO. These restrictions mean the facility and Project will be a synthetic minor source of air pollution, as the emissions are limited to below major source thresholds for the Title V program and NSPS limits.

A complete review of the proposed project indicates that the facility is expected to comply with the applicable federal and state air pollution rules and regulations. The Department will make a final recommendation on the issuance of a Permit to Construct for the County Line Gas Plant following the completion of a 30-day public comment period. The public comment period will run from April 29, 2026 through May 29, 2026.

DES:

Table 1 – Facility PTE for NSR Pollutants (tons per year) [A]

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	CO	NO_X	SO_2	VOCs	PM_{TOT}	Total HAPs	Formaldehyde (Largest HAP)
EG dehydration unit, still vent	EG-1still	EG-1still	--	--	--	2.71	--	1.39	--
DEVCO gas fired hot oil heater	HTR-1	HTR-1	2.52	3.01	0.02	0.17	0.23	0.06	0.00
Three 400 bbl condensate tanks	TK-1, TK-2, & TK-3	COMB	3.42	0.40	0.00	3.85	--	0.07	--
400 bbl produced water tank	TK-7		0.00	0.00	0.00	0.28		0.00	
Condensate truck loadout	LOAD-1		0.03	0.01	0.00	1.92	--	0.00	--
Pressurized loadout of NGLs	LOAD-2		0.23	0.11	0.00	1.52	--	0.03	--
Produced water loadout	LOAD-3		0.00	0.00	0.00	0.00	--	0.00	--
Zeeco combustor - pilot	COMB		0.25	0.13	0.00	0.23	--	0.01	--
Engine 1 - 2,065 hp	ENG-1	ENG-1	9.97	9.97	0.04	13.96	0.68	4.09	2.79
Engine 2 - 2,065 hp	ENG-2	ENG-2	9.97	9.97	0.04	13.96	0.68	4.09	2.79
Engine 3 - 1,681 hp	ENG-3	ENG-3	8.12	8.12	0.04	11.36	1.32	2.20	0.81
Engine 4 - 2,750 hp	ENG-4	ENG-4	13.28	13.28	0.05	18.59	0.78	5.64	3.19
Gas fired hot oil heater	HTR-2	HTR-2	1.80	2.15	0.01	0.03	0.16	0.04	0.00
EG dehydration unit, still vent	EG-2still	FL-1	0.61	0.31	0.13	0.03	--	0.02	--
EG dehydration unit, flash tank	EG-2flash		1.64	0.82	0.33	0.08	--	0.00	--
Zeeco flare - pilot	FL-1		0.25	0.13	0.00	0.23	--	0.01	--
Zeeco flare - upset/emergency [B]	N/A		44.66	22.37	0.00	8.26	--		--

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	CO	NO_X	SO_2	VOCs	PM_{TOT}	Total HAPs	Formaldehyde (Largest HAP)
1,000 gallon ethylene glycol tank	TK-4	TK-4	--	--	--	0.01	--	--	--
1,000 gallon methanol tank	TK-5	TK-5	--	--	--	0.01	--	0.00	--
1,000 gallon lube oil tank	TK-6	TK-6	--	--	--	--	--	--	--
MSS activities and pigging	MISC	MISC	--	--	--	8.26	--	0.13	--
Four electric-driven compressors	EC-1 though EC-4	EC-1 though EC-4	--	--	--	0.00	--	--	--
Process fugitive emissions	FUG	FUG	--	--	--	5.36	--	0.06	--
Total (without Fugitives and FL-1 upset/emergency):			**52.09**	**48.40**	**0.66**	**68.93**	**3.85**	**17.66**	**9.59**
Total (with Fugitives and FL-1 upset/emergency):			**96.75**	**70.77**	**0.66**	**90.81**	**3.85**	**17.85**	**9.59**

A Abbreviations:
PM_{TOT}: PM, PM_{10}, $PM_{2.5}$ filterable and condensable particulate matter
SO_2: sulfur dioxide
NO_X: oxides of nitrogen
CO: carbon monoxide
VOCs: volatile organic compounds
HAPs: hazardous air pollutants as defined in Section 112(b) of the Clean Air Act

B Emissions estimated based on flaring 73.33 MMscf/yr of high pressure gas