SYNTHETIC MINOR OPERATING PERMIT

PERMITTEE: **PRUET PRODUCTION COMPANY**

FACILITY NAME: BARNETT AREA NO. 1 OIL AND GAS PRODUCTION FACILITIES

LOCATION: CONECUH COUNTY, ALABAMA

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
103-0046-X002	AFFECTED FACILITIES LOCATED IN BARNETT AREA NO. 1 (See Summary)

DRAFT

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

ISSUANCE DATE: DRAFT 11/12/2026

Alabama Department of Environmental Management

ATIC 34-12 OIL AND GAS PRODUCTION WELL

Location: SW/4 of Section 34, Township 4 North, Range 7 East, in Conecuh County, Alabama

- 0.5 million British thermal unit (MMBtu) per hour (MMBtu/hr) heater treater [HT-01]
- Emergency Flare [FL-01]
- Inlet Separator and Low Pressure (LP) Separator
- Fugitive Emissions Components [FUG] associated with this wellsite
- Closed vent system (CVS)
- Storage Vessels equipped with vapor recovery unit (VRU)
    - One (1), 500 bbl power oil storage vessel (potential for flash emissions) [T-01]
    - Four (4), 400-barrel (bbl) condensate storage vessel [T-02, T-03, T-04, T-05]
    - One (1), 400 bbl saltwater storage vessel [T-06]

BARNETT GAS PLANT

Location: SW/4 of Section 34, Township 4 North, Range 7 East, in Conecuh County, Alabama

- 202 HP (150 kilowatts (kW)), Caterpillar, Model No. 3306B, four stroke, rich burn, spark ignition, compressor engine equipped with a non-selective catalytic reduction (NSCR/3-way catalyst) [ENG-01]

ATIC 33-8 OIL AND GAS PRODUCTION WELL

Location : Section 33, Township 4 North, Range 7 East, in Conecuh County, AL

- 0.5 million British thermal unit (MMBtu) per hour (MMBtu/hr) heater treater [HT-02]
- Emergency Flare [FL-02]
- High Pressure (HP) Separator and LP Separator
- Fugitive Emissions Components [FUG] associated with this wellsite
- Closed vent system (CVS)
- Storage Vessels with vapor recovery unit (VRU)
    - One (1), 500-bbl power oil storage vessel (potential for flash emissions) [T-07]
    - Four (4), 400 bbl condensate storage vessel [T-08, T-09, T-10, T-11]
    - One (1), 400 bbl saltwater storage vessel [T-12]

DRAFT

1. This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.

2. This permit is not transferable. Upon sale or legal transfer, the new owner or operator must apply for a permit within 30 days.

3. A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.

4. The permittee shall keep this permit under file or on display at all times at the site where the facility for which the permit is issued is located and shall make the permit readily available for inspection by any or all persons who may request to see it.

5. Each point of emission, which requires testing, will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.

6. All air pollution control equipment shall be operated at all times while this process is operational. In the event of scheduled maintenance, unscheduled maintenance, or a breakdown of the pollution control equipment, the process shall be shut down as expeditiously as possible (unless this act and subsequent re-start would clearly cause greater emissions than continuing operations of the process for a short period). The Department shall be notified of all such events that exceed **one (1) hour** within 24 hours. The notification shall include all pertinent facts, including the duration of the process operating without the control device and the level of excess emissions which have occurred. Records of all such events, regardless of reporting requirements, shall be made and maintained for a period of five years. These records shall be available for inspection.

7. In case of shutdown of air pollution control equipment for scheduled maintenance for a period greater than **one (1) hour**, the intent to shut down shall be reported to the Air Division at least 24 hours prior to the planned shutdown, unless accompanied by the immediate shutdown of the emission source.

8. In the event there is a breakdown of equipment in such a manner as to cause increased emission of air contaminants for a period greater than **one (1) hour**, the person responsible for such equipment shall notify the Air Division within an additional 24 hours and provide a statement giving all pertinent facts, including the duration of the breakdown. The Air Division shall be notified when the breakdown has been corrected

9. This process, including all air pollution control devices and capture systems for which this permit is issued, shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for

ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.

10. This Permit expires and the application is cancelled if construction has not begun within 24 months of the date of issuance of the Permit.

11. On completion of construction of the device(s) for which this Permit is issued, written notification of the fact is to be submitted to the Chief of the Air Division. The notification shall indicate whether the device(s) was constructed as proposed in the application. The device(s) shall not be operated until authorization to operate is granted by the Chief of the Air Division. Failure to notify the Chief of the Air Division of completion of construction and/or operation without authorization could result in revocation of this Permit.

12. Submittals of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require stack emission testing at any time.

13. Additions and revisions to the conditions of this Permit will be made, if necessary, to ensure that the Department's air pollution control rules and regulations are not violated.

14. Nothing in this permit or conditions thereto shall negate any authority granted to the Air Division pursuant to the Alabama Environmental Management Act or regulations issued thereunder.

15. The Air Division must be notified in writing at least 30 working days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.

    (a) To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:

    (b) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.

    (c) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedure requires probe cleaning).

    (d) A description of the process(es) to be tested, including the feed rate, any operating parameter used to control or influence the operations, and the rated capacity.

    (e) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.

(f) A pretest meeting may be held at the request of the source owner or the Department. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.

(g) All test reports must be submitted to the Air Division within 60 days of the actual completion of the test.

16. Any performance tests required shall be conducted and data reduced in accordance with the test methods and procedures contained in each specific permit condition unless the Director (1) specifies or approves, in specific cases, the use of a reference method with minor changes in methodology, (2) approves the use of an equivalent method, or (3) approves the use of an alternative method, the results of which he has determined to be adequate for indicating whether a specific source is in compliance.

17. Records will be maintained of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the process equipment and any malfunction of the air pollution control equipment. These records will be kept in a permanent form suitable for inspection and will be retained for at least two years following the date of each occurrence

18. This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.

19. Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.

(a) Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plants or haul roads and grounds:

(1) By the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;

(2) By reducing the speed of vehicular traffic to a point below that at which dust emissions are created;

(3) By paving; or

(4) By the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions.

(b) Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative

methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne.

20. Precautions shall be taken by the permittee and its personnel to ensure that no person shall ignite, cause to be ignited, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.

21. Facility-wide emissions from all affected facilities (see Summary Page) shall not exceed the following requirements:

    (a) Carbon monoxide (CO) emissions shall not exceed 99 tons per 12-month rolling average.

    (b) Volatile organic compound (VOC) shall not exceed 99 tons per 12-month rolling average.

    (c) Individual hazardous air pollutant (HAP) emissions shall not exceed 9.5 tons per 12-month rolling period.

    (d) Total HAPs emissions shall not exceed 24.5 tons per 12-month rolling period.

22. To ensure that the facility-wide emission limits in Proviso 21 are not exceeded, the Permittee is required to comply with the following:

    (a) Capture all gas vapors from each well emission point and route them through a closed vent system to the gas processing and treating facility to remove natural gas liquids (NGLs) from the gas using a Joules-Thompson (JT) skid, sweetening the produced gas using a Sulfa Treat System, and routing the gas to a sales line.

        (1) Provided that the Permittee is unable to send the produced gas through the process for sales, flaring or venting may be allowed only during the times and for the durations specified in Proviso 26(c)(3)(ii) or (iii).

        (2) Provided that gas from the each well is not capable of being processed and treated at the Barnett Plant and routed through the sales pipeline to an end user, the Permittee will shut in the wells and not flare the well gas, except as allowed under 40 CFR 60 Subpart OOOOb.

    (b) The Permittee will maintain covers and controls on each storage vessel that has the potential for flash emissions as defined under 40 CFR §63.761 of 40 CFR 63 Subpart HH, "*National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities*".

    (c) The Permittee shall calculate the monthly emissions and maintain a monthly record of the cumulative 12-month rolling average emissions for each regulated air pollutant from each affected facility.

(d) A semi-annual report shall be submitted to the Department on the following schedule:

Reporting Period	**Report Due**
January 1 through June 30	July 31
July 1 through December 31	January 31

(e) The report shall include the following:

(1) Calculated emissions (Monthly, 12-Month Rolling Averages) from each affected facility

(2) Deviations reported during the reporting period for any affected facility

23. The following requirements shall be met for each heater treater to demonstrate compliance with this permit.

(a) The heater treater shall not emit particulate of an opacity greater than twenty percent (20%), as determined by a six (6)-minute average except that, during one six-minute period in any sixty (60)-minute period, the Permittee may emit particulate of an opacity not greater than forty percent (40%).

(1) Method 9 of Appendix A-4 to 40 CFR Part 60 (Method 9) shall be used in the determination of the opacity of the stack emissions from the heater treater.

(2) If the opacity standards are exceeded and cannot be corrected within 1 hour, a Method 9 observation should be conducted.

(3) Method 9 observations shall meet the following requirements:

(i) The observation shall be conducted by an observer that is certified and familiar with Method 9 procedures.

(ii) The observation shall be conducted during daylight hours.

(4) The Permittee shall maintain a record of any deviations from the opacity standards in Proviso 23(a). The record shall include the cause of the visible emissions, the corrective actions taken, and the date, time, and duration of the deviation.

(5) The Permittee shall maintain a record of each visible emissions observation required by Proviso 23(a)(2), including the date and time of the observation. The observation shall be documented using the "Visible Emission Observation Form" available in EPA's Visible Emissions Field Manual.

(b) Each heater treater shall comply with the following emission standards by burning natural gas as fuel:

(1) Particulate matter (PM) emissions shall not exceed 0.5 pounds per million British thermal unit (lbs/MMBtu).

(2) Sulfur dioxide (SO_2) emissions shall not exceed 4.0 lbs/MMBtu.

(c) When a heater treater is fired with fuel gas, regulated air pollutant emissions from the heater treater shall be calculated monthly and included in the cumulative facility-wide emissions.

24. The ENG-01 compressor engine, is subject to the requirements specified in 40 CFR 60 Subpart JJJJ, "*Standards of Performance for Stationary Spark Ignition Internal Combustion Engines [NSPS JJJJ]"*.

(a) The engine must comply with the applicable requirements of 40 CFR Part 60, Subpart A, "*General Provisions*" as specified in Table 3 of NSPS JJJJ.

(b) The compressor engine is a natural gas fired, four stroke rich burn, non-emergency, and non-certified engine, that is equipped with a non-selective catalytic reduction (NSCR)/3-way catalyst.

(c) The engine must comply with the following requirements:

(1) The provisions of 40 CFR §60.4236 shall be applicable.

(2) The following emission standards specified in Table 1 of NSPS JJJJ shall be met:

(i) Nitrogen oxide (NO_X) emissions shall not exceed 1.0 grams per horsepower hour (g/HP-hr) or a NO_X concentration of 82 part per million dry (ppmvd) @ 15% oxygen (O_2).

(ii) CO emissions shall not exceed 2.0 g/HP-hr or a CO concentration of 270 ppmvd @ 15% O_2.

(iii) VOC emissions shall not exceed 0.7 g/HP-hr or a VOC concentration of 60 ppmvd @ 15% O_2. When calculating VOC emissions, emissions of formaldehyde should not be included.

(iv) The emission standards must be met over the entire life of the engine.

(3) The engine may operate using propane for a maximum of 100 hours per year as an alternative fuel solely during emergency operations.

(i) A record of emergency use shall be kept.

(ii) If propane is used for more than 100 hours per year in an engine that is not certified to the emission standards when using propane, a performance test must be conducted to demonstrate compliance with the emission standards in 40 CFR §60.4233(e).

(d) If an air-to-fuel ratio (AFR) controller is used with the operation of three-way catalysts/non-selective catalytic reduction, the controller must be maintained and operated appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times.

(e) To demonstrate compliance with the emission standards found in Proviso 24(c)(2), the following requirements shall be met:

(1) A maintenance plan and records of conducted maintenance must be kept and, to the extent practicable, the engine must be maintained and operated in a manner consistent with good air pollution control practice for minimizing emissions.

(2) Performance tests must be conducted on the engine if it undergoes a rebuild, major repair, or maintenance.

(i) Engine rebuilding means to overhaul an engine or to otherwise perform extensive service on the engine (or on a portion of the engine or engine system).

(ii) Perform extensive service means to disassemble the engine (or portion of the engine or engine system), inspect and/or replace many of the parts, and reassemble the engine (or portion of the engine or engine system) in such a manner that significantly increases the service life of the resultant engine.

(3) Subsequent performance testing on engine (ENG-01) utilizing the methods and procedures specified in Proviso 24(e)(3)(i) through (iii) is only required if the conditions in Proviso 24(e)(2) are met.

(i) Performance testing shall be conducted on the proposed engine using the methods and procedures specified in 40 CFR §60.4244(a) through (f).

(ii) Performance test reports using EPA Method 18, EPA Method 320, or ASTM D6348-03 (incorporated by reference—see 40 CFR 60.17) to measure VOC require reporting of all QA/QC data.

(iii) For Method 18, report results from sections 8.4 and 11.1.1.4; for Method 320, report results from sections 8.6.2, 9.0, and 13.0; and for ASTM D6348-03 report results of all QA/QC procedures in Annexes 1-7.

(4) Within sixty (60) days after the date of completing each performance test when applicable, the Permittee must submit the results following the procedures specified in 40 CFR §60.4245(g) to the United States Environmental Protection Agency (EPA) and to the Department for onsite inspections as specified in 40 CFR §60.4245(f) and (j).

(f) The records specified in 40 CFR §60.4245(a)(1), (2), and (4) shall be maintained to demonstrate compliance with the notification, reporting and recordkeeping requirements under NSPS JJJJ.

(1) If notification or reports are required to be submitted to EPA, they must be reported according to 40 CFR §60.4245(g) and submitted separately to the Department.

(2) Issues with timely electronic submittals of reports for system outages may be addressed as specified in 40 CFR §60.4245(h).

(3) A claim of force majeure for failure to comply with reporting requirements may be asserted as specified in 40 CFR §60.4245(i).

(g) Regulated air pollutant emissions from the compressor engine shall be calculated monthly and included in the cumulative emissions for the facility.

25. The following units are subject to the applicable requirements of 40 CFR 60, Subpart OOOOb *"Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification or Reconstruction Commenced After December 6, 2022 (NSPS OOOOb)"*.

(a) The ATIC 34-12 Well and the ATIC 33-8 Well are well-affected facilities located within the Crude Oil and Natural Gas source category.

(b) Well affected facilities where liquid unloading occurs are affected facilities under this subpart.

(c) The ATIC 34-12 Well and ATIC 33-8 Well will produce associated gas; therefore, the requirements and standards under 40 CFR §60.5377b shall be met.

(d) The storage vessels at both well sites are affected facilities under this subpart because the tank battery will have the potential for VOC emissions equal to or greater than six (6) tons per year (TPY) or the potential for methane (CH_3) emissions equal to or greater than 20 TPY.

(e) The collection of fugitive emissions components at both wells are affected facilities under this subpart.

(f) If for any reason, the requirements of NSPS OOOOb are no longer effective, such as a stay of regulations or if the regulation is rescinded, the Permittee shall comply with the applicable requirements of 40 CFR Part 60, *"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 6, 2022" (NSPS OOOOa) for the well, storage vessels, flare, closed vent systems, and collections of fugitive emissions components at the affect facility.

(g) Except as specified in Proviso 25(f) of this permit, affected facilities must comply with the applicable requirements of 40 CFR Part 60, Subpart A, "*General Provisions*" as specified in Table 5 of NSPS OOOOb.

26. The following requirements shall be met to demonstrate compliance with NSPS OOOOb for the following affected facilities:

(a) *All Affected Facilities*:

(1) Compliance with the requirements of this subpart shall be met upon initial startup of affected facilities, except as specified in the applicable sections of 40 CFR §60.5370b(a)(1) through (9) and 40 CFR §60.5377b(b) or (c).

(2) Alternative means of emission limitations for greenhouse (GHG) and VOC emissions may be elected as specified in 40 CFR §60.5399b.

(3) At all times, including periods of startup, shutdown, and malfunction, owners and operators shall maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.

(i) Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

(ii) The provisions for exemption from compliance during periods of startup, shutdown and malfunctions provided for in 40 CFR §60.8(c) do not apply to NSPS OOOOb.

(4) Initial compliance with the standards for each affected facility shall be met as specified in 40 CFR §60.5410b.

(5) The following recordkeeping requirements must be met for applicable affected facilities:

(i) Records identified as specified in 40 CFR §60.7(f) and in 40 CFR §60.5420b(c) must be maintained.

(ii) Records must be maintained either onsite or at the nearest local field office for at least five (5) years.

(iii) Any records required to be maintained by this subpart that are submitted electronically via EPA's CEDRI may be maintained in electronic format. This ability to maintain electronic copies does not affect the requirement for facilities to make records, data, and reports available upon request to the Department or the EPA as part of an on-site compliance evaluation.

(6) To comply with the reporting requirements under this subpart, an annual report, where applicable, must be submitted via the Compliance and Emission Data Reporting Interface (CEDRI) website according to the requirements in 40 CFR §60.5420b(b)(15).

(i) The initial annual report is due no later than ninety (90) days after the end of the initial compliance period as determined according to 40 CFR §60.5410b.

(ii) Subsequent annual reports are due no later than the same date each year as the initial annual report.

(iii) Electronic reporting is required for notifications and reports according to 40 CFR §60.5420b(d).

(iv) A copy of the annual report submitted to EPA must also be provided to the Department.

(7) Emissions from all affected facilities under this subpart shall be calculated monthly and included in the cumulative emissions for the facility.

(b) Super-Emitter events must meet the requirements in 40 CFR §60.5371b after January 22, 2027, unless there is a stay of regulations or if the requirements are rescinded.

(c) *Well-Affected Facility*:

(1) If hydraulic fracturing or refracturing of a well occurs, the requirements specified in 40 CFR §60.5375b shall be met:

(i) These activities will trigger a modification at an existing well except as specified in Proviso 26(c)(1)(ii).

(ii) Except as provided in 40 CFR §60.5365b(e)(3)(ii)(C) and (i)(3)(ii), any action described by 40 CFR §60.5365b(a)(1)(i) and (ii), by itself, does not affect the modification status of process unit equipment, centrifugal or reciprocating compressors, pumps, or process controllers.

(2) The Permittee shall comply with the applicable requirements in 40 CFR §60.5376b for *Gas Well Liquids Unloading Operations* when required.

(i) A liquid unloading event is not considered to be a modification.

(ii) Alternative means of emission limitations for greenhouse gases (GHG) and volatile organic compound (VOC) emissions from liquids unloading operations may be elected as specified in 40 CFR §60.5399b.

(3) The facility must comply with the following requirements for *Associated Gas Wells:*

(i) Upon startup and at all times, comply with the applicable requirements in 40 CFR §60.5377b(a), except as allowed in Provisos 26(c)(3)(ii) and (iii) of this section.

(ii) The Permittee will be allowed to temporarily route the associated gas to a flare or other control device that achieves a 95.0 percent (%) reduction in VOC and methane emissions in the situations and for the durations specified in 40 CFR §60.5377b(d)(1)-(4).

(A) The associated gas routed to a flare or control device must be routed through a closed vent system that meets the requirements of 40 CFR §60.5411b(a) and the design requirements in 40 CFR §60.5411b(c).

(B) The closed vent system must be designed to capture and route all gases, vapors, and fumes to a process or a control device that meets the applicable requirements specified in 40 CFR §60.5412b(a) through (d).

(C) Records must be kept of all instances in which associated gas is temporarily routed to a flare or to a control device in accordance with 40 CFR §60.5420b(c)(3)(i)(B).

(D) Each instance when the gas is temporarily routed to the flare or a control device, must be reported in the annual report in accordance with 40 CFR §60.5420b(b)(4)(i)(B).

(iii) The Permittee may temporarily vent the associated gas in the situations and for the durations identified in 40 CFR §60.5377b(e)(1)-(3), per incident. The following requirements shall be met during these periods:

(A) The cumulative period of venting must not exceed twenty-four (24) hours for any calendar year.

(B) Records must be kept of all venting instances in accordance with 40 CFR §60.5420b(c)(3)(ii).

(C) Each instance of venting must be reported in the annual report in accordance with 40 CFR §60.5420b(b)(4)(ii).

(iv) The following compliance requirements must be met to demonstrate compliance with NSPS OOOOb for associated gas wells:

(A) Initial compliance with the standards that apply to associated gas wells as required by 40 CFR §60.5410b(c) must be demonstrated.

(B) Continuous compliance with the standards that apply to associated gas wells as required by 40 CFR §60.5415b(c) and (f) must be demonstrated.

(v) Where applicable, the notification requirements specified in 40 CFR §60.5420b(a) shall be met.

(vi) The following recordkeeping and reporting requirements shall be met for associated gas wells:

(A) The reporting requirements specified in 40 CFR §60.5420b(b)(1) and (4), and 40 CFR §60.5420b(b)(11) and (12), as applicable must be performed.

(B) The recordkeeping requirements specified in 40 CFR §60.5420b(c)(3) and (8), and (c)(10) through (13), as applicable must be performed.

(4) If a well-affected facility undergoes a change of ownership during the reporting period, the reporting requirements under 40 CFR §60.5420b(b)(2)-(4) are required to be met.

(5) A flare used to comply with 40 CFR §60.5377b(d) during temporary flaring at a well affected facility, must be installed, designed and operated according to 40 CFR §60.5412b(a)(3)(i) through (viii) or alternatively meet the requirements specified in 40 CFR §60.5412b(d).

(i) The flare must be operated at all times when gases, vapors, and fumes are vented from the affected facility through the closed vent system to the control device. More than one affected facility can be vented to the flare to comply with NSPS OOOOb.

(ii) After January 22, 2027, the Permittee must install and operate a continuous burning pilot or combustion flame, and an alert

must be sent to the nearest control room whenever the pilot or combustion flame is unlit.

(iii) The Permittee must conduct a compliance determination using Method 22 of appendix A-7 in 40 CFR 60 to determine visible emissions from the flare OR monitor the flare and record the flame continuously using a video surveillance camera according to 40 CFR §60.5417b(h).

(iv) The net heating value of the vent gas must be determined according to 40 CFR §60.5417b(d)(8)(ii).

(v) To demonstrate that a flare or enclosed combustion device reduces methane and VOC in the gases vented to the device by 95.0 percent by weight or greater, as outlined in 40 CFR §60.8(b), a request for an alternative test method meeting the requirements outlined in 40 CFR §60.5412b(d)(1) through (5) may be elected.

(vi) A flare using an alternative test method approved under 40 §60.5412b(d), must comply with 40 CFR §60.5417b(i)(1) through (6).

(vii) Records for the flare must be maintained as specified in 40 CFR §60.5420b(c)(11) and an annual report must be submitted as required in 40 CFR §60.5420b(b)(1) and (11).

(d) *Storage Vessel Affected Facility*

(1) Except as specified in 40 CFR 60.5365b(e)(5)(iv), within thirty (30) days after startup of production, or within 30 days after reconstruction or a modification occurs, emissions must be calculated based on the cumulative emissions from all storage vessels within the tank battery to determine potential VOC and methane emissions.

(i) Beginning January 22, 2027, when determining the emissions for affected storage vessels, the determination may take into account requirements under a legally and practically enforceable limit in an operating permit or other requirements established under a Federal, state, local or Tribal authority as specified in 40 CFR §60.5365b(e)(2)(i).

(ii) Beginning January 22, 2027, the potential for VOC and methane emissions must be calculated using a generally accepted model or calculation methodology that accounts for flashing, working, and breathing losses, based on the maximum average daily throughput to the tank battery determined for a 30-day period of production.

(iii) For storage vessels not subject to a legally and practicably enforceable limit in an operating permit or other requirements established under a Federal, state, local or Tribal authority, any vapor from the storage vessel that is recovered and routed to a process through a vapor recovery unit designed and operated as specified in 40 CFR §60.5365b(e)(5) is not required to be included in the determination of potential for VOC or methane emissions for purposes of determining affected facility status, provided that the following requirements are met:

(A) The cover requirements specified in 40 CFR §60.5411b(b) are met.

(B) The closed vent requirements specified in 40 CFR §60.5411b(a)(2) through (4) and (c) are met.

(C) The records that document compliance with 40 CFR §60.5365(e)(5)(i) and (ii) are maintained.

(D) Provided that the requirements under this section are not met, the facility must comply with the requirements specified in 40 CFR §60.5395b for the storage affected facility within 30 days after startup of production and the Permittee must achieve the required emissions reduction within 30 days after the determination in 40 CFR §60.5370b(a)(2).

(iv) Provided that there is a removal of apparatus that recovers and routes vapor to a process, or operation that is inconsistent with the conditions in 40 CFR §60.5365b(e)(5)(i) and (ii), the storage vessels potential for VOC emissions according to this section shall be determined within 30 days of such removal or operation.

(v) Provided that an existing tank battery becomes an affected facility as a result of reconstruction as defined in 40 CFR §60.5365b(e)(3)(i) or modification as defined in 40 CFR §60.5365b(e)(3)(ii), compliance with the requirement specified in 40 CFR § 60.5395b(a)(1) must be met within 30 days after startup of production or within 30 days after reconstruction or modification of the storage vessel affected facility.

(2) The requirements specified in 40 CFR §60.5365b(e)(6) shall apply to each storage vessel affected facility immediately upon startup, startup of production, or return to service.

(i) A storage vessel affected facility or portion of a storage vessel affected facility that is reconnected to the original source of

liquids remains a storage vessel affected facility subject to the same requirements that applied before being removed from service.

(ii) Any storage vessel that is used to replace a storage vessel affected facility, or portion of a storage vessel affected facility, or used to expand a storage vessel affected facility, assumes the affected facility status of the storage vessel affected facility being replaced or expanded.

(e) *Fugitive Emission Components Affected Facilities at a Wellsite*:

(1) Fugitive emission components affected facilities (such as valves (including separator dump valves), connectors, pressure relief devices, open-ended lines, flanges, covers and closed vent systems not subject to 40 CFR §60.5411b, thief hatches or other openings on a storage vessel not subject to 40 CFR §60.5395b, compressors, instruments, meters, and yard piping) must comply with the requirements in 40 CFR §60.5397b to reduce fugitive emissions of methane and VOC.

(2) The requirement in 40 CFR §60.5398b(a) may be elected as an alternative to GHG and VOC standards in 40 CFR §60.5397b(a) and the alternative continuous inspection and monitoring requirements for covers and closed vent systems in 40 CFR §60.5416b(a)(1)(ii) and (iii), (2)(ii) through (iv), and (3)(iii) and (iv) may be elected.

(3) For purposes of 40 CFR §60.5397b and 40 CFR §60.5398b, a "modification" to a well site occurs as specified in 40 CFR §60.5365b(i):

(i) A new well is drilled at an existing well site;

(ii) A well at an existing well site is hydraulically fractured; or

(iii) A well at an existing well site is hydraulically refractured.

(4) The following requirements must be met to demonstrate compliance with this subpart for fugitive components affected facilities:

(i) Initial compliance with this subpart must be demonstrated by complying with the standards in 40 CFR §60.5397b(i).

(ii) Continuous compliance with this subpart must be demonstrated by complying with the standards in 40 CFR §60.5397b(j).

(5) The requirements for well closures shall be met in accordance with 40 CFR §60.5397b(l).

(6) To demonstrate compliance with the monitoring requirements under this subpart, the following must be met:

(i) All fugitive emissions components must be monitored in accordance with 40 CFR §60.5397b(b) through (g).

(ii) All sources of fugitive emissions must be repaired in accordance with 40 CFR §60.5397b(h).

(7) The following recordkeeping and reporting requirements shall be met for fugitive components:

(i) The applicable recordkeeping requirements as specified in 40 CFR §60.5420b(c)(14) must be performed.

(ii) The applicable reporting requirements as specified in 40 CFR §60.5420b(b)(1) and (9) must be met.

(iii) If the alternative GHG and VOC standards for fugitive emission components affected facilities are elected, the additional recordkeeping and reporting requirements under 40 CFR §60.5424b must be met.

(8) Notifications for well closures shall be submitted as specified in 40 CFR §60.5420b(a)(4).

(f) *Covers and Closed Vent System*:

(1) Initial and continuous closed vent system inspection and monitoring requirements specified in 40 CFR §60.5416b must be met.

(2) If a control device is installed or emissions are routed to a process, each closed vent system must be inspected according to the procedures and schedule specified in 40 CFR §60.5416b(a)(1) and (2).

(3) Each cover shall be inspected according to the procedures and schedule specified in 40 CFR §60.5416b(a)(3).

(4) Closed vent system inspections shall be conducted using the methods specified in 40 CFR §60.5416b(b).

(5) Inspection of the covers shall be conducted except as provided in 40 CFR §60.5416b(b)(7) for unsafe to inspect (UTI) requirements and 40 CFR §60.5416b(b)(8) for difficult to inspect (DTI) requirements.

(6) After January 22, 2027, the Permittee must meet the requirements of 40 CFR §60.5416b(b)(1) through (9) if an inspection of the closed vent system and cover is required as specified in 40 CFR §60.5416b(a)(1), (2) or (3) or 40 CFR §60.5398b(b).

(7) If the alternative GHG and VOC standards for covers and closed vent system in 40 CFR §60.5398b are elected, the additional recordkeeping and reporting requirements under 40 CFR §60.5424b must be met.

27. Should this facility, at any time, exceed the limits listed herein, the Permittee shall notify the Air Division within **two (2) working days** of determining that the exceedance occurred.

28. The Permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.

29. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.

November 12, 2026

Draft Date