



State of Utah

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Governor

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Department of
Environmental Quality

Kimberly D. Shelley
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DIVISION OF AIR QUALITY
Bryce C. Bird
Director

DAQE-IN126560008-21

December 13, 2021

Thomas Muchard
Price River Energy, LLC
950 Echo Lane, Suite 200
Houston, TX 77024
t.muchard@priceriverenergy.com

Dear Mr. Muchard:

Re: Intent to Approve:
Modification to Approval Order DAQE-AN126560006-15 to Remove Two (2) 1,293-hp
Compressor Engines and Install a 637-hp Compressor Engine
Project Number: N126560008

The attached document is the Intent to Approve (ITA) for the above-referenced project. The ITA is subject to public review. Any comments received shall be considered before an Approval Order (AO) is issued. The Division of Air Quality is authorized to charge a fee for reimbursement of the actual costs incurred in the issuance of an AO. An invoice will follow upon issuance of the final AO.

Future correspondence on this ITA should include the engineer's name, **Dylan Frederick**, as well as the DAQE number as shown on the upper right-hand corner of this letter. Dylan Frederick, can be reached at (385) 306-6529 or dfrederick@utah.gov, if you have any questions.

Sincerely,

Alan D. Humpherys, Manager
New Source Review Section

ADH:DF:sa

cc: Southeastern Utah District Health Department

STATE OF UTAH
Department of Environmental Quality
Division of Air Quality

INTENT TO APPROVE
DAQE-IN126560008-21
Modification to Approval Order DAQE-AN126560006-15
to Remove Two (2) 1,293-hp Compressor Engines and
Install a 637-hp Compressor Engine

Prepared By
Dylan Frederick, Engineer
(385) 306-6529
dfrederick@utah.gov

Issued to
Price River Energy, LLC - Gordon Creek Compressor Facility

Issued On
December 13, 2021



New Source Review Section Manager
Alan D. Humpherys

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GENERAL INFORMATION

CONTACT/LOCATION INFORMATION

Owner Name

Price River Energy, LLC

Source NamePrice River Energy, LLC - Gordon Creek
Compressor Facility**Mailing Address**950 Echo Lane, Suite 200
Houston, TX 77024**Physical Address**SE/4 Sec. 32 T13S R8E
Price, UT 84501**Source Contact**Name Thomas Muchard
Phone (713) 907-8257
Email t.muchard@priceriverenergy.com**UTM Coordinates**495,936 m Easting
4,388,998 m Northing
Datum NAD83
UTM Zone 12**SIC code** 1311 (Crude Petroleum & Natural Gas)

SOURCE INFORMATION

General Description

Price River Energy, LLC. (Price River) operates the Gordon Creek compressor facility in Carbon County Utah. Price River extracts and processes natural gas in the Gordon Creek Field. The gas is sent to the compressor station where the station processes natural gas as it travels along the gas pipeline. The facility removes condensation from the gas product and pressurizes the gas, allowing it to reach its final destination.

NSR Classification

Minor Modification at Minor Source

Source ClassificationLocated in Attainment Area
Carbon County
Airs Source Size: B**Applicable Federal Standards**

NSPS (Part 60), A: General Provisions

NSPS (Part 60), IIII: Standards of Performance for Stationary Compression Ignition Internal
Combustion EnginesNSPS (Part 60), JJJJ: Standards of Performance for Stationary Spark Ignition Internal
Combustion EnginesNSPS (Part 60), OOOO: Standards of Performance for Crude Oil and Natural Gas Production,
Transmission and Distribution for which Construction, Modification, or Reconstruction
Commenced After August 23, 2011, and on or before September 18, 2015

MACT (Part 63), A: General Provisions

MACT (Part 63), HH: NESHAP From Oil and Natural Gas Production Facilities

MACT (Part 63), ZZZZ: NESHAP for Stationary Reciprocating Internal Combustion Engines

Project Description

Price River has requested to remove two (2) existing 1,293-hp compressor engines and install one (1) 637-hp compressor engine in their place. As a result of this modification, site-wide PTE was reevaluated and the following changes were made to permit requirements:

1. Compressor Engine requirements were changed to use updated requirement language, and limits were decreased to account for the new smaller engine.
2. Requirements on the backup generators were changed to use updated requirement language specific to emergency engines and use of ultra-low sulfur diesel. The emergency engines are now limited to 100 hours for testing and maintenance, and do not have a limit on emergency use.

SUMMARY OF EMISSIONS

The emissions listed below are an estimate of the total potential emissions from the source. Some rounding of emissions is possible.

| Criteria Pollutant | Change (TPY) | Total (TPY) |
|--|---------------------|--------------------|
| CO ₂ Equivalent | -6675 | 7037.00 |
| Carbon Monoxide | 0.80 | 13.55 |
| Nitrogen Oxides | -0.52 | 23.37 |
| Particulate Matter - PM ₁₀ | 0.03 | 0.06 |
| Particulate Matter - PM _{2.5} | 0.03 | 0.06 |
| Sulfur Dioxide | | 0.08 |
| Volatile Organic Compounds | -0.71 | 5.35 |

| Hazardous Air Pollutant | Change (lbs/yr) | Total (lbs/yr) |
|--------------------------------|------------------------|-----------------------|
| Acetaldehyde (CAS #75070) | | 771 |
| Acrolein (CAS #107028) | | 474 |
| Formaldehyde (CAS #50000) | -3860 | 480 |
| Generic HAPs (CAS #GHAPS) | 164 | 184 |
| Hexane (CAS #110543) | 0 | 20 |
| Methanol (CAS #67561) | | 230 |
| | Change (TPY) | Total (TPY) |
| Total HAPs | -1.11 | 1.08 |

PUBLIC NOTICE STATEMENT

The NOI for the above-referenced project has been evaluated and has been found to be consistent with the requirements of UAC R307. Air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an AO by the Director.

A 30-day public comment period will be held in accordance with UAC R307-401-7. A notification of the ITA will be published in the ETV News (Emery Telcom) on December 15, 2021. During the public comment period the proposal and the evaluation of its impact on air quality will be available for the public to review and provide comment. If anyone so requests a public hearing within 15 days of publication, it will be held in accordance with UAC R307-401-7. The hearing will be held as close as practicable to the location of the source. Any comments received during the public comment period and the hearing will be evaluated. The proposed conditions of the AO may be changed as a result of the comments received.

SECTION I: GENERAL PROVISIONS

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

| | |
|-----|--|
| I.1 | All definitions, terms, abbreviations, and references used in this AO conform to those used in the UAC R307 and 40 CFR. Unless noted otherwise, references cited in these AO conditions refer to those rules. [R307-101] |
| I.3 | Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved. [R307-401-1] |
| I.2 | The limits set forth in this AO shall not be exceeded without prior approval. [R307-401] |
| I.4 | All records referenced in this AO or in other applicable rules, which are required to be kept by the owner/operator, shall be made available to the Director or Director's representative upon request, and the records shall include the two-year period prior to the date of the request. Unless otherwise specified in this AO or in other applicable state and federal rules, records shall be kept for a minimum of two (2) years. [R307-401-8] |
| I.5 | At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this AO, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed on equipment authorized by this AO shall be recorded. [R307-401-4] |
| I.6 | The owner/operator shall comply with UAC R307-107. General Requirements: Breakdowns. [R307-107] |
| I.7 | The owner/operator shall comply with UAC R307-150 Series. Emission Inventories. [R307-150] |
| I.8 | The owner/operator shall submit documentation of the status of the new 637 hp compressor engine to the Director within 18 months from the date of this AO. This AO may become invalid if construction is not commenced within 18 months from the date of this AO or if construction is discontinued for 18 months or more. To ensure proper credit when notifying the Director, send the documentation to the Director, attn.: NSR Section. [R307-401-18] |

SECTION II: PERMITTED EQUIPMENT

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

II.A THE APPROVED EQUIPMENT

| | |
|--------|---|
| II.A.1 | Gordon Creek Compressor Facility |
|--------|---|

| | |
|--------|--|
| II.A.2 | <p>One (1) 637 hp Compressor Engine (New) Fuel: Natural Gas Type: 4 Stroke, Lean Burn Manufacturing Date: November 30, 2006 Control: Oxidation Catalyst Applicable MACT: Subpart ZZZZ</p> |
| II.A.3 | <p>One (1) Generator Engine Fuel: Natural Gas Type: 4 Stroke, Lean Burn Rating: 350 kW Control: Selective Catalytic Reduction Applicable NSPS: Subpart JJJJ Applicable MACT: Subpart ZZZZ</p> |
| II.A.4 | <p>One (1) Backup Generator Engine Fuel: Diesel Size: 547 hp Applicable NSPS: Subpart IIII Applicable MACT: Subpart ZZZZ</p> |
| II.A.5 | <p>Two (2) Storage Tanks Capacity: 400 barrels (each) Contents: Condensate and waste water containing lube oil</p> |
| II.A.6 | <p>One (1) Produced Water Tank Capacity: 400 barrels</p> |
| II.A.7 | <p>One (1) Glycol Dehydration Unit Rated Capacity: 16 MMscf/day</p> |

SECTION II: SPECIAL PROVISIONS

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

II.B REQUIREMENTS AND LIMITATIONS

| | |
|------------|--|
| II.B.1 | Site-Wide Requirements |
| II.B.1.a | Unless otherwise specified in this AO, the owner/operator shall not allow visible emissions from any stationary point or fugitive emission source on site to exceed 10% opacity. [R307-401-8] |
| II.B.1.a.1 | Unless otherwise specified in this AO, opacity observations of emissions from stationary sources shall be conducted according to 40 CFR 60, Appendix A, Method 9. [R307-201-3] |
| II.B.2 | Compressor Engine Requirements |
| II.B.2.a | The owner/operator shall use only natural gas as fuel in the Compressor Engine. [R307-401-8] |
| II.B.2.b | The owner/operator shall install oxidation catalysts on the 637 HP compressor engine. All exhaust emissions from the compressor engine shall be routed through the oxidation catalysts prior to being released to the atmosphere. [R307-401-8] |

| | | | | | | | | | |
|-----------------|---|-----------|-------|-----------------|------|----|------|-----|------|
| II.B.2.c | <p>The owner/operator shall not emit more than the following rates from the 637-hp Compressor Engine:</p> <table border="0" style="width: 100%;"> <tr> <td style="width: 60%;">Pollutant</td> <td style="text-align: right;">lb/hr</td> </tr> <tr> <td>NO_x</td> <td style="text-align: right;">2.81</td> </tr> <tr> <td>CO</td> <td style="text-align: right;">2.38</td> </tr> <tr> <td>VOC</td> <td style="text-align: right;">0.63</td> </tr> </table> <p>[R307-401-8]</p> | Pollutant | lb/hr | NO _x | 2.81 | CO | 2.38 | VOC | 0.63 |
| Pollutant | lb/hr | | | | | | | | |
| NO _x | 2.81 | | | | | | | | |
| CO | 2.38 | | | | | | | | |
| VOC | 0.63 | | | | | | | | |
| II.B.2.c.1 | <p>Compliance Demonstration To demonstrate compliance with the emission limitations above, the owner/operator shall perform stack testing on the emissions unit according to the stack testing conditions contained in this AO. [R307-165-2, R307-401-8]</p> | | | | | | | | |
| II.B.2.c.2 | <p>Initial Test The owner/operator shall conduct an initial stack test on the emission unit within 180 days after startup of the emission unit. [R307-165-2]</p> | | | | | | | | |
| II.B.2.c.3 | <p>Test Frequency The owner/operator shall conduct a stack test on the emission unit within five (5) years after the date of the most recent stack test of the emission unit. The Director may require the owner/operator to perform a stack test at any time. [R307-165-2, R307-401-8]</p> | | | | | | | | |
| II.B.3 | <p>Stack Testing Requirements</p> | | | | | | | | |
| II.B.3.a | <p>The owner/operator shall conduct any stack testing required by this AO according to the following conditions. [R307-401-8]</p> | | | | | | | | |
| II.B.3.a.1 | <p>Notification At least 30 days prior to conducting a stack test, the owner/operator shall submit a source test protocol to the Director. The source test protocol shall include the items contained in R307-165-3. If directed by the Director, the owner/operator shall attend a pretest conference. [R307-165-3, R307-401-8]</p> | | | | | | | | |
| II.B.3.a.2 | <p>Testing & Test Conditions The owner/operator shall conduct testing according to the approved source test protocol and according to the test conditions contained in R307-165-4. [R307-165-4, R307-401-8]</p> | | | | | | | | |
| II.B.3.a.3 | <p>Access The owner/operator shall provide Occupational Safety and Health Administration (OSHA)- or Mine Safety and Health Administration (MSHA)-approved access to the test location. [R307-401-8]</p> | | | | | | | | |
| II.B.3.a.4 | <p>Reporting No later than 60 days after completing a stack test, the owner/operator shall submit a written report of the results from the stack testing to the Director. The report shall include validated results and supporting information. [R307-165-5, R307-401-8]</p> | | | | | | | | |
| II.B.3.a.5 | <p>Possible Rejection of Test Results The Director may reject stack testing results if the test did not follow the approved source test protocol or for a reason specified in R307-165-6. [R307-165-6, R307-401-8]</p> | | | | | | | | |
| II.B.3.b | <p>Test Methods When performing stack testing, the owner/operator shall use the appropriate EPA-approved test methods as acceptable to the Director. Acceptable test methods for pollutants are listed below. [R307-401-8]</p> | | | | | | | | |

| | |
|------------|---|
| II.B.3.b.1 | <p>Standard Conditions</p> <p>A. Temperature – 68°F (293 K)</p> <p>B. Pressure - 29.92 in Hg (101.3 kPa)</p> <p>C. Averaging Time - As specified in the applicable test method</p> <p>[40 CFR 60 Subpart A, 40 CFR 63 Subpart A, R307-401-8]</p> |
| II.B.3.b.2 | <p>NO_x 40 CFR 60, Appendix A, Method 7; Method 7E; or other EPA-approved testing method as acceptable to the Director. [R307-401-8]</p> |
| II.B.3.b.3 | <p>VOC 40 CFR 60, Appendix A, Method 18; Method 25; Method 25A; 40 CFR 63, Appendix A, Method 320; or other EPA-approved testing method as acceptable to the Director. [R307-401-8]</p> |
| II.B.3.b.4 | <p>CO 40 CFR 60, Appendix A, Method 10 or other EPA-approved testing method as acceptable to the Director. [R307-401-8]</p> |
| II.B.4 | <p>Generator Engine Requirements</p> |
| II.B.4.a | <p>The owner/operator shall not operate the emergency engine on site for more than 100 hours per rolling 12-month period during non-emergency situations. There is no time limit on the use of the engines during emergencies. [R307-401-8]</p> |
| II.B.4.b | <p>To determine compliance with a rolling 12-month total, the owner/operator shall calculate a new 12-month total by the 20th day of each month using data from the previous 12 months. Records documenting the operation of the backup generator shall be kept in a log and shall include the following:</p> <p>A. The date the engine was used</p> <p>B. The duration of operation in hours</p> <p>C. The reason for emergency engine usage</p> <p>[R307-401-8]</p> |
| II.B.4.c | <p>The owner/operator shall use only natural gas as a fuel source in the 350 kW (II.A.3) Generator Engine. [R307-401-8]</p> |
| II.B.4.d | <p>The owner/operator shall only use diesel fuel (e.g. fuel oil #1, #2, or diesel fuel oil additives) as fuel in the emergency generator (II.A.4). [R307-401-8]</p> |
| II.B.4.e | <p>Visible emissions from the diesel-fired backup generator shall not exceed 20% opacity at any time. [R307-401-8]</p> |
| II.B.4.f | <p>The owner/operator shall only combust diesel fuel that meets the definition of ultra-low sulfur diesel (ULSD), which has a sulfur content of 15 ppm or less. [R307-401-8]</p> |
| II.B.4.f.1 | <p>To demonstrate compliance with the ULSD fuel requirement, the owner/operator shall maintain records of diesel fuel purchase invoices or obtain certification of sulfur content from the diesel fuel supplier. The diesel fuel purchase invoices shall indicate the diesel fuel meets the ULSD requirements. [R307-401-8]</p> |

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| II.B.5 | Tank Requirements |
| II.B.5.a | The owner/operator shall not produce more than 5,333 barrels (1 barrel = 42 gallons) of condensate per rolling 12-month period. [R307-401-8] |
| II.B.5.a.1 | To determine compliance with a rolling 12-month total, the owner/operator shall calculate a new 12-month total by the 20th day of each month using data from the previous 12 months. Records of condensate production shall be kept for all periods when the plant is in operation. Condensate produced shall be determined by company and/or customer billing records. The records of condensate production shall be kept on a daily basis. [R307-401-8] |
| II.B.5.b | The owner/operator shall keep the storage tank thief hatches closed and latched except during tank unloading or other maintenance activities. [R307-401-8] |
| II.B.5.b.1 | The owner/operator shall inspect the thief hatches at least once every six (6) months to ensure the thief hatches are closed, latched, and the associated gaskets, if any, are in good working condition. Records of thief hatch inspections shall include the date of the inspection and the status of the thief hatches. [R307-401-8] |
| II.B.5.c | The owner/operator shall load condensate into the tanker trucks by the use of submerged loading. [R307-401-8] |

PERMIT HISTORY

This Approval Order shall supersede or will be based on the following documents:

| | |
|---|--|
| Supersedes Is Derived From Incorporates Incorporates Incorporates | AO DAQE-AN126560006-15 dated May 18, 2015 NOI dated March 11, 2020 Additional Information dated August 27, 2020 Additional Information dated September 4, 2020 Additional Information dated October 26, 2021 |
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ACRONYMS

The following lists commonly used acronyms and associated translations as they apply to this document:

| | |
|-------------------|---|
| 40 CFR | Title 40 of the Code of Federal Regulations |
| AO | Approval Order |
| BACT | Best Available Control Technology |
| CAA | Clean Air Act |
| CAAA | Clean Air Act Amendments |
| CDS | Classification Data System (used by Environmental Protection Agency to classify sources by size/type) |
| CEM | Continuous emissions monitor |
| CEMS | Continuous emissions monitoring system |
| CFR | Code of Federal Regulations |
| CMS | Continuous monitoring system |
| CO | Carbon monoxide |
| CO ₂ | Carbon Dioxide |
| CO _{2e} | Carbon Dioxide Equivalent - Title 40 of the Code of Federal Regulations Part 98, Subpart A, Table A-1 |
| COM | Continuous opacity monitor |
| DAQ/UDAQ | Division of Air Quality |
| DAQE | This is a document tracking code for internal Division of Air Quality use |
| EPA | Environmental Protection Agency |
| FDCP | Fugitive dust control plan |
| GHG | Greenhouse Gas(es) - Title 40 of the Code of Federal Regulations 52.21 (b)(49)(i) |
| GWP | Global Warming Potential - Title 40 of the Code of Federal Regulations Part 86.1818-12(a) |
| HAP or HAPs | Hazardous air pollutant(s) |
| ITA | Intent to Approve |
| LB/YR | Pounds per year |
| MACT | Maximum Achievable Control Technology |
| MMBTU | Million British Thermal Units |
| NAA | Nonattainment Area |
| NAAQS | National Ambient Air Quality Standards |
| NESHAP | National Emission Standards for Hazardous Air Pollutants |
| NOI | Notice of Intent |
| NO _x | Oxides of nitrogen |
| NSPS | New Source Performance Standard |
| NSR | New Source Review |
| PM ₁₀ | Particulate matter less than 10 microns in size |
| PM _{2.5} | Particulate matter less than 2.5 microns in size |
| PSD | Prevention of Significant Deterioration |
| PTE | Potential to Emit |
| R307 | Rules Series 307 |
| R307-401 | Rules Series 307 - Section 401 |
| SO ₂ | Sulfur dioxide |
| Title IV | Title IV of the Clean Air Act |
| Title V | Title V of the Clean Air Act |
| TPY | Tons per year |
| UAC | Utah Administrative Code |
| VOC | Volatile organic compounds |