



State of Utah

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Department of
Environmental Quality

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Executive Director

DIVISION OF AIR QUALITY
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DAQE-IN150710006-25

October 23, 2025

Brandon McDowell
Wildcat Midstream LP
1308 Lake Street
Fort Worth, TX 76102
bmcowell@finleyresources.com

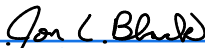
Dear Mr. McDowell:

Re: Intent to Approve: Modification to Approval Order DAQE-AN150710005-24 to Expand
Transloading Operations
Project Number: N150710006

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, **Christine Bodell**, as well as the DAQE number as shown on the upper right-hand corner of this letter. Christine Bodell, can be reached at (385) 290-2690 or cbodell@utah.gov, if you have any questions.

Sincerely,


Jon Black (Oct 22, 2025 22:09:43 MDT)

Jon L. Black, Manager
New Source Review Section

JLB:CB:jg

cc: Southeastern Utah District Health Department

STATE OF UTAH
Department of Environmental Quality
Division of Air Quality

INTENT TO APPROVE
DAQE-IN150710006-25
Modification to Approval Order DAQE-AN150710005-24
to Expand Transloading Operations

Prepared By
Christine Bodell, Engineer
(385) 290-2690
cbodell@utah.gov

Issued to
Wildcat Midstream LP - Petroleum Transloading Facility

Issued On
October 23, 2025


Jon Black (Oct 22, 2025 22:09:43 MDT)

New Source Review Section Manager
Jon L. Black

TABLE OF CONTENTS

TITLE/SIGNATURE PAGE	1
GENERAL INFORMATION	3
CONTACT/LOCATION INFORMATION	3
SOURCE INFORMATION	3
General Description	3
NSR Classification.....	3
Source Classification	3
Applicable Federal Standards	3
Project Description.....	4
SUMMARY OF EMISSIONS.....	4
PUBLIC NOTICE STATEMENT.....	4
SECTION I: GENERAL PROVISIONS	5
SECTION II: PERMITTED EQUIPMENT	5
SECTION II: SPECIAL PROVISIONS.....	6
PERMIT HISTORY	10
ACRONYMS.....	11

GENERAL INFORMATION

CONTACT/LOCATION INFORMATION

Owner Name

Wildcat Midstream LP

Source Name

Wildcat Midstream LP - Petroleum Transloading Facility

Mailing Address

1308 Lake Street
Fort Worth, TX 76102

Physical Address

5441 Consumer Road
Helper, UT 84526

Source Contact

Name: Brandon McDowell
Phone: (720) 846-1270
Email: bmcowell@finleyresources.com

UTM Coordinates

507,140 m Easting
4,390,088 m Northing
Datum NAD83
UTM Zone 12

SIC code 5171 (Petroleum Bulk Stations & Terminals)

SOURCE INFORMATION

General Description

Wildcat Midstream LP (Wildcat) currently owns/operates an industrial wax (crude oil) trans-loading facility near Helper, Carbon County. The facility receives crude oil from highway petroleum tanker trucks that is unloaded through permanently affixed above-ground electric pumps. The oil is either transferred directly to rail tanker cars using portable transloaders or stored on site in one of four above-ground heated internal-floating-roof storage tanks prior to being loaded into rail tanker cars. The facility processes up to 73,000,000 barrels (1 barrel = 42 gallons) of crude oil per year.

NSR Classification

Minor Modification at Minor Source

Source Classification

Located in Attainment Area
Carbon County
Airs Source Size: B

Applicable Federal Standards

NSPS (Part 60), A: General Provisions
NSPS (Part 60), Kb: Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984

Project Description

Wildcat has requested a modification to AO DAQE-AN150710005-24, dated May 21, 2024, to increase the throughput of industrial wax (crude oil) by 100,000 barrels per day (36,500,000 barrels per year).

Per Condition II.B.5.a of the 2024 AO, Wildcat is currently permitted to transload a throughput of no more than 36,500,000 barrels of industrial wax (crude oil) per rolling 12-month period. Per Condition II.B.6.a of the 2024 AO, Wildcat is only permitted to load the rail cars on site directly from the industrial wax (crude oil) storage tanks.

Wildcat has requested that the additional 36,500,000 barrels per year be loaded into railcars directly from delivery trucks via portable transloaders. Therefore, VOC emissions from loading operations from crude oil storage tanks will continue to be controlled via vapor capture line to the combustor, as required by Condition II.B.6.c of the 2024 AO. The VOC emissions from the transloading operations for the additional 36,500,000 barrels per year will be controlled via vapor balancing.

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	0	12453.00
Carbon Monoxide	0	11.68
Nitrogen Oxides	0	8.60
Particulate Matter - PM ₁₀	2.44	5.63
Particulate Matter - PM _{2.5}	0.24	1.24
Sulfur Dioxide	0	0.43
Volatile Organic Compounds	12.48	46.22

Hazardous Air Pollutant	Change (lbs/yr)	Total (lbs/yr)
Benzene (Including Benzene From Gasoline) (CAS #71432)	256	826
Generic HAPs (CAS #GHAPS)	20	88
Hexane (CAS #110543)	4840	15860
Toluene (CAS #108883)	330	1092
	Change (TPY)	Total (TPY)
Total HAPs	2.72	8.93

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 intent to approve will be published in the ETV News (Emery Telcom) on October 29, 2025. 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.2	The limits set forth in this AO shall not be exceeded without prior approval. [R307-401]
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.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]

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	Petroleum Transloading Facility
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II.A.2	One (1) Vapor Combustor Unit 97% Destruction Efficiency
II.A.3	One (1) 5.6 MMBtu/hr Tank Heater Fuel: Natural Gas
II.A.4	Two (2) Conical Internal-Floating-Roof Tanks Contents: Industrial wax (crude oil) Capacity: 80,000 barrels each NSPS Applicability: Subpart Kb MACT Applicability: None
II.A.5	Pump Engines Electrically Operated - listed for informational purposes only -
II.A.6	Portable Transloaders

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 to exceed 10% opacity. [R307-401-8]
II.B.1.a.1	Opacity observations of emissions from stationary sources shall be conducted in accordance with 40 CFR 60, Method 9. [R307-401-8]
II.B.2	Haul Road and Fugitive Dust Requirements
II.B.2.a	The owner/operator shall not allow visible emissions from haul roads and fugitive dust sources on site to exceed 20% opacity. [R307-401-8]
II.B.2.a.1	Opacity observations of fugitive dust from intermittent sources shall be conducted according to 40 CFR 60, Appendix A, Method 9; however, the requirement for observations to be made at 15-second intervals over a six-minute period shall not apply. The number of observations and the time period shall be determined by the length of the intermittent source. For fugitive dust generated by mobile sources, visible emissions shall be measured at the densest point of the plume but at a point not less than one-half vehicle length behind the vehicle and not less than one-half the height of the vehicle. [R307-401-8]
II.B.2.b	The owner/operator shall pave the entry haul road for no less than 1,320 feet (0.25 miles) in length. The owner/operator shall not exceed 1,320 feet (0.25 miles) of haul roads on site. [R307-401-8]
II.B.2.b.1	The paved road length shall be determined through source records or Global Positioning System (GPS) measurements. [R307-401-8]

II.B.2.c	An operational sweeper and water truck shall be made available during each operating day. The owner/operator shall sweep and flush with water all the paved haul roads on site to maintain opacity limits listed in this AO. If the temperature is below freezing, the owner/operator shall continue to sweep the road but may stop flushing the paved haul roads with water. Flushing the paved haul road with water shall resume when the temperature is above freezing. If the haul roads are covered with snow or ice, the owner/operator may stop sweeping the paved haul roads. Sweeping the paved haul roads shall resume when the haul roads are cleared from snow and ice. [R307-401-8]
II.B.2.c.1	Records of sweeping and water application shall be kept for all periods when the plant is in operation. The records shall include the following items: A. Date and time treatments were made B. Number of treatments made and quantity of water applied C. Rainfall amount received, if any D. Records of temperature, if the temperature is below freezing E. Records shall note if the paved haul roads are covered with snow or ice. [R307-401-8]
II.B.3	Vapor Combustor Unit Requirements
II.B.3.a	The vapor combustor unit shall operate with a continuous pilot flame and be equipped with an auto-igniter. [R307-401-8]
II.B.3.b	The vapor combustor unit shall operate with no visible emissions. [R307-401-8]
II.B.3.b.1	Visual determination of emissions from the vapor combustor unit shall be conducted according to 40 CFR 60, Appendix A, Method 22. [R307-401-8]
II.B.3.c	The owner/operator shall install a vapor combustor unit that is certified to meet a VOC destruction efficiency of no less than 97%. [R307-401-8]
II.B.3.c.1	To demonstrate compliance with the above condition, the owner/operator shall maintain records of the manufacturer's emissions guarantee for the installed vapor combustor unit. [R307-401-8]
II.B.3.d	The owner/operator shall operate the vapor combustion unit according to the manufacturer's recommendations. [R307-401-8]
II.B.4	Hot Oil Heater Requirements
II.B.4.a	The owner/operator shall use only pipeline-quality natural gas as fuel in the heater. [R307-401-8]
II.B.5	Storage Tank (Storage Vessel) Requirements
II.B.5.a	The owner/operator shall keep the storage tank thief hatches and other tank openings closed and sealed except during tank unloading or other maintenance activities. [R307-401-8]
II.B.5.b	At least once each month, the owner/operator shall visually inspect, through manholes and roof hatches, each internal floating roof seal and closed vent system (including tank openings, thief hatches, and bypass devices) for defects. Records of inspections shall include the date of the inspection and the results of the inspection. [R307-401-8]
II.B.5.c	The owner/operator shall load the storage tanks on site by the use of bottom filling or a submerged fill pipe. [R307-401-8]

II.B.6	Liquid Loading Requirements
II.B.6.a	The owner/operator shall not exceed a throughput of 73,000,000 barrels (1 barrel = 42 gallons) of crude oil per rolling 12-month period. [R307-401-8]
II.B.6.a.1	<p>The owner/operator shall:</p> <ul style="list-style-type: none"> A. Determine the crude oil throughput with process flow meters and/or sales records B. Record crude oil throughput on a daily basis C. Use the monthly throughput data to calculate a new 12-month total by the 20th day of each month using data from the previous 12 months D. Keep the throughput records for all periods the plant is in operation. <p>[R307-401-8]</p>
II.B.6.b	The owner/operator shall load the rail cars on site by the use of bottom filling or a submerged fill pipe. [R307-401-8]
II.B.6.c	The owner/operator shall only load the rail cars on site directly from the crude oil storage tanks or from tanker trucks that are certified for the NSPS level annual leak test. [R307-401-8]
II.B.6.c.1	To determine compliance with the above condition, the owner/operator shall maintain records of annual leak test certifications. [R307-401-8]
II.B.6.d	If transloading crude oil from the storage tanks, the owner/operator shall control VOC emissions during rail car loading operations at all times by using a vapor capture line. The vapor capture line shall be connected from the rail car to the vapor combustor. [R307-401-8]
II.B.6.e	If transloading crude oil from tanker trucks, the owner/operator shall connect a vapor balance line to the receiving and delivery vessels prior to venting to the atmosphere during on-site loading operations. The vapor balance line shall be used at all times during loading operations when transloading from tanker trucks. [R307-401-8]
II.B.6.f	The owner/operator shall operate each vapor balance system according to the manufacturer's recommendations. [R307-401-8]
II.B.6.f.1	To demonstrate compliance with the above condition, the owner/operator shall maintain records of the manufacturer's recommendations for each installed vapor balance system. [R307-401-8]
II.B.7	Monitoring Requirements of Fugitive Emissions (Leak Detection and Repair)
II.B.7.a	<p>The owner/operator shall develop a fugitive emissions monitoring plan. At a minimum, the plan shall include:</p> <ul style="list-style-type: none"> A. Monitoring frequency B. Monitoring technique and equipment C. Procedures and timeframes for identifying and repairing leaks D. Recordkeeping practices E. Calibration and maintenance procedures. <p>[R307-401-8]</p>

II.B.7.a.1	The plan shall address monitoring for "difficult-to-monitor" and "unsafe-to-monitor" components. [R307-401-8]
II.B.7.b	<p>The owner/operator shall conduct monitoring surveys on site to observe each "fugitive emissions component" for "fugitive emissions."</p> <p>A. "Fugitive emissions component" means any component that has the potential to emit fugitive emissions of VOC, including but not limited to valves, connectors, pressure relief devices, open-ended lines, flanges, covers, and closed vent systems, thief hatches or other openings, compressors, instruments, and meters</p> <p>B. "Fugitive emissions" are considered any visible emissions observed using optical gas imaging or a Method 21 instrument reading of 500 ppm or greater.</p> <p>[R307-401-8]</p>
II.B.7.b.1	<p>Monitoring surveys shall be conducted according to the following schedule:</p> <p>A. No later than 60 days after startup of production, as defined in 40 CFR 60.5430a</p> <p>B. Semiannually after the initial monitoring survey. Consecutive semiannual monitoring surveys shall be conducted at least four (4) months apart</p> <p>C. Annually after the initial monitoring survey for "difficult-to-monitor" components</p> <p>D. As required by the owner/operator's monitoring plan for "unsafe-to-monitor" components.</p> <p>[R307-401-8]</p>
II.B.7.b.2	<p>Monitoring surveys shall be conducted using one or both of the following to detect fugitive emissions:</p> <p>A. Optical gas imaging (OGI) equipment. OGI equipment shall be capable of imaging gases in the spectral range for the compound of highest concentration in the potential fugitive emissions</p> <p>B. Monitoring equipment that meets U.S. EPA Method 21, 40 CFR Part 60, Appendix A.</p> <p>[R307-401-8]</p>
II.B.7.c	<p>If fugitive emissions are detected at any time, the owner/operator shall repair the fugitive emissions component as soon as possible but no later than 15 calendar days after detection.</p> <p>If the repair or replacement is technically infeasible, would require a vent blowdown, a well shutdown, or a well shut-in, or would be unsafe to repair during operation of the unit, the repair or replacement must be completed during the next well shutdown or well shut-in, after an unscheduled, planned, or emergency vent blowdown, or within 24 months, whichever is earlier.</p> <p>[R307-401-8]</p>
II.B.7.c.1	The owner/operator shall resurvey the repaired or replaced fugitive emissions component no later than 30 calendar days after the fugitive emissions component was repaired. [R307-401-8]
II.B.7.d	The owner/operator shall maintain records of the fugitive emissions monitoring plan, monitoring surveys, repairs, and resurveys. [R307-401-8]

PERMIT HISTORY

This Approval Order shall supersede (if a modification) or will be based on the following documents:

Supersedes
Is Derived From

AO DAQE-AN150710005-24 dated May 21, 2024
NOI dated August 11, 2025

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