

AIR POLLUTION CONTROL PERMIT TO CONSTRUCT

Permittee: Name: Nesson Gathering System, LLC	Permit Number: ACP-17970 v 1.1
Address: 22777 Springwoods Village Pkwy Spring, Texas 77389	Permit Description: Synthetic Minor Permit to Construct
Source Name & Location: Rough Rider Compressor Station SW ¼, SE ¼, Sec. 34, T155N, R95W Lat/Long: 48.198744/-102.878902 Williams County, North Dakota	Source Type: Compressor Station [Gathering/Boosting]
Date of Application: August 8, 2025	

Pursuant to Chapter 23.1-06 of the North Dakota Century Code (NDCC), and the Air Pollution Control Rules of the State of North Dakota (Article 33.1-15 of the North Dakota Administrative Code or NDAC), and in reliance on statements and representations heretofore made by the permittee (i.e., owner) designated above, a Permit to Construct is hereby issued authorizing such permittee to construct and initially operate the source unit(s) at the location designated above. This Permit to Construct is subject to all applicable rules and orders now or hereafter in effect of the North Dakota Department of Environmental Quality (Department) and to any conditions specified below:

James L. Semerad
Director
Division of Air Quality

Date: _____

1. Project and Facility Emissions Units:

This Permit to Construct does not affect the operation of the facility emissions units, does not allow for the construction of any new emissions units at the facility, and does not allow for the modification or reconstruction of any existing emissions units.

Table 1 lists all the permitted emission units associated with Rough Rider Compressor Station.

Table 1: Facility Emissions Units

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	Air Pollution Control Equipment
Caterpillar G3608 TALE (4SLB) natural gas-fired compressor engine rated at 2,500 bhp (2019) (NSPS JJJJ, OOOOa) ^A	ENG1	ENG1	Catalytic Oxidizer
Caterpillar G3608 TALE (4SLB) natural gas-fired compressor engine rated at 2,500 bhp (2019) (NSPS JJJJ, OOOOa) ^A	ENG2	ENG2	Catalytic Oxidizer
Caterpillar G3608 TALE (4SLB) natural gas-fired compressor engine rated at 2,500 bhp (2019) (NSPS JJJJ, OOOOa) ^A	ENG3	ENG3	Catalytic Oxidizer
Caterpillar G3608 TALE (4SLB) natural gas-fired compressor engine rated at 2,500 bhp (2019) (NSPS JJJJ, OOOOa) ^A	ENG4	ENG4	Catalytic Oxidizer
Caterpillar G3608 TALE (4SLB) natural gas-fired compressor engine rated at 2,500 bhp (2019) (NSPS JJJJ, OOOOa) ^A	ENG5	ENG5	Catalytic Oxidizer
Caterpillar G3608 TALE (4SLB) natural gas-fired compressor engine rated at 2,500 bhp (2019) (NSPS JJJJ, OOOOa) ^A	ENG6	ENG6	Catalytic Oxidizer
Caterpillar G3608 TALE (4SLB) natural gas-fired compressor engine rated at 2,500 bhp (2019) (NSPS JJJJ, OOOOa) ^A	ENG7	ENG7	Catalytic Oxidizer
Caterpillar G3608 TALE (4SLB) natural gas-fired compressor engine rated at 2,500 bhp (2019) (NSPS JJJJ, OOOOa) ^A	ENG8	ENG8	Catalytic Oxidizer
Triethylene glycol (TEG) dehydration unit rated at 50 MMSCFD (MACT HH)	DEHY1 ^B	HP FLARE & DEHY COMB	BTEx Condenser and Combustor
TEG dehydration unit rated at 50 MMSCFD (MACT HH)	DEHY2 ^B		
TEG regeneration reboiler natural gas-fired rated at 0.75 MMBtu/hr	HTR1	HTR1	None
TEG regeneration reboiler natural gas-fired rated at 0.75 MMBtu/hr	HTR2	HTR2	None
Fuel membrane natural gas-fired heater rated at 2.5 MMBtu/hr	HTR3	HTR3	None

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	Air Pollution Control Equipment
One 500-barrel gun barrel tank	T001	LP COMB	Submerged Fill Pipe (SFP) & Combustor
Four 400-barrel condensate storage tanks	T002 through T005	LP COMB	SFP & Combustor
Two 400-barrel produced water storage tanks	T006 & T007	LP COMB	SFP & Combustor
Condensate and produced water truck loading	LOAD	LP COMB	Combustor
Low pressure combustor (tanks and truck loading)	LP COMB	LP COMB	None
Dehydration unit combustor (BTEX control)	DEHY COMB	DEHY COMB	None
Emergency flare	HP FLARE	HP FLARE	None
Compressor blowdowns	MSS ^C	BD VENT	None
Fugitive Emissions (OOOOa)	FUG ^D	FUG	Leak Detection and Repair (LDAR) Program

^A The compressors driven by EUs ENG1 through ENG8 were manufactured after September 18, 2015 and on or before December 6, 2022, and therefore, are subject to the requirements of NSPS OOOOa.

^B TEG dehydration flash tanks may be controlled by emergency flare (HP FLARE) during pigging events. Still columns are controlled by a BTEX condenser and BTEX combustor (DEHY COMB).

^C Compressor blowdowns are normally routed to inlet suction or the emergency flare. However, certain maintenance blowdown events may vent to atmosphere.

^D Insignificant or fugitive emission source (no specific emission limits).

2. Applicable Standards, Restrictions and Miscellaneous Conditions:

This Permit to Construct does not affect any existing applicable standards and does not impose any permit miscellaneous conditions.

3. Emission Unit Limits:

Emission limits from the operation of the source unit(s) identified in Table 1 of this Permit to Construct (hereafter referred to as "permit") are as follows. Source units not listed are subject to the applicable emission limits specified in the North Dakota Air Pollution Control Rules.

Upon issuance of this permit, the emission limits set forth in Air Permit to Construct No.ACP-17970 v1.0 are rescinded. The emission limits are replaced with the following:

Table 2: Permit Emissions Limits

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	Pollutant / Parameter	Emission Limit ^A
Caterpillar G3608 TALE (4SLB) natural gas-fired compressor engines	ENG1 through ENG8	ENG1 through ENG8	NO _x	0.40 g/hp-hr ^B
			CO	0.44 g/hp-hr ^B
			VOC	0.42 g/hp-hr ^B
			Opacity	20% ^C
Low pressure combustor (tanks and truck loading) ^D	LP COMB	LP COMB	Opacity	20% ^C
Dehydration unit combustor ^D	DEHY COMB	DEHY COMB	Opacity	20% ^C
TEG regeneration reboiler ^D	HTR1	HTR1	Opacity	20% ^C
TEG regeneration reboiler ^D	HTR2	HTR2	Opacity	20% ^C
Fuel membrane natural gas-fired heater ^D	HTR3	HTR3	Opacity	20% ^C
Emergency Flare ^D	HP FLARE	HP FLARE	Opacity	20% ^E

^A Emission limits apply to each individual emission point.

^B Less restrictive 40 CFR 60 Subpart JJJJ limits also apply as follows: NO_x of 1.0 g/hp-hr or 82 ppmvd @ 15% O₂, CO of 2.0 g/hp-hr or 270 ppmvd @ 15% O₂, and VOC of 0.7 g/hp-hr or 60 ppmvd @ 15% O₂.

^C 40% opacity is permissible for not more than one six-minute period per hour.

^D Not affected with this permit action. Included for ease of permit revision or renewal.

^E 60% opacity is permissible for not more than one six-minute period per hour.

4. Emission Testing Requirements:

This Permit to Construct does not affect any existing emissions testing or general conditions and does not impose any new existing emissions testing or general conditions.