

**AIR QUALITY EFFECTS ANALYSIS
FOR
PERMIT TO CONSTRUCT
ACP-18262 v1.0**

Applicant:

ONEOK Rockies Midstream, L.L.C.
100 West Fifth Street
Tulsa, Oklahoma 74103

Facility Location:

Nighthawk Compressor Station
NW ¼, NW ¼, Sec. 20, T148N, R97W
Lat/Long: 47.634381/-103.080066
Dunn County, North Dakota

Introduction and Background:

ONEOK Rockies Midstream, L.L.C. submitted a permit to construct application to the North Dakota Department of Environmental Quality – Division of Air Quality (Department) on August 9, 2024. The application was for construction and operation of a new natural gas pipeline compressor station (Nighthawk Compressor Station) to be located in Dunn County, North Dakota.

The application requested the construction and operation of two Caterpillar natural gas-fired compressor engines each rated up to 2,750 horsepower (hp) (EUs C-1 & C-2), a process flare (EU FL-1), three condensate tanks (EUs TK-1 through TK-3), a produced water tank (EU WTK-1), a methanol tank (EU MTK-1), a truck loadout (EU TL-1), fugitive emissions (EU FUG), and other emissions associated with blowdowns and maintenance (EU BD).

Upon completion of construction, the facility will be a synthetic minor source.

Table 1 lists the emissions units associated with the Nighthawk Compressor Station.

Table 1 - Source-wide Permitted Equipment.

Emission Unit Description ^A	Emission Unit (EU)	Emission Point (EP)	Air Pollution Control Equipment
Caterpillar G3608 (4SLB) natural gas-fired compressor engine rated 2,750 hp (NSPS JJJJ & MACT ZZZZ) (NSPS OOOOb) ^B	C-1	C-1	Oxidation Catalyst
Caterpillar G3608 (4SLB) natural gas-fired compressor engine rated 2,750 hp (NSPS JJJJ & MACT ZZZZ) (NSPS OOOOb) ^B	C-2	C-2	Oxidation Catalyst
Three 400-bbl condensate tanks (NSPS OOOOb)	TK-1 through TK-3	FL-1	Process/VOC Flare (EU FL-1)
400-bbl produced water tank (NSPS OOOOb)	WTK-1	FL-1	Process/VOC Flare (EU FL-1)
400-bbl methanol tank	MTK-1	MTK-1	Submerged Fill Pipe (SFP)
Process/VOC flare (NSPS OOOOb)	FL-1	FL-1	None
Truck loading	TL-1	TL-1	Submerged Filling Arm
Fugitive emissions (NSPS OOOOb)	FUG ^C	FUG	Leak Detection and Repair (LDAR) Program
Blowdowns and maintenance venting	BD ^C	BD	None

^A All emission unit ratings are considered nominal ratings.

^B The compressor driven by the natural gas-fired engine is subject to NSPS OOOOb.

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

Facility-Wide Emissions Profile
Potential to Emit (PTE)

Table 2 – Facility-Wide PTE for NSR Pollutants (tons per year) ^A

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	CO	NO_x	SO₂	VOCs	PM	PM₁₀	PM_{2.5}	Total HAPs	Formaldehyde (Largest HAP)
Caterpillar natural gas-fired compressor engine	C-1	C-1	30.0	26.6	0.1	15.9	0.9	0.9	0.9	2.6	2.1
Caterpillar natural gas-fired compressor engine	C-2	C-2	30.0	26.6	0.1	15.9	0.9	0.9	0.9	2.6	2.1
Condensate tank	TK-1	FL-1	-	-	-	13.0	-	-	-	0.7	-
Condensate tank	TK-2										
Condensate tank	TK-3										
Produced water tank	WTK-1										
Process/VOC flare	FL-1										
Process/VOC flare	FL-1		4.3	1.5	0.2	0.3	0.1	0.1	0.1	0.0	0.0
Methanol tank	MTK-1	MTK-1	-	-	-	0.2	-	-	-	0.2	-
Truck loading	TL-1	TL-1	-	-	-	20.0	-	-	-	1.1	-
Fugitive emissions	FUG	FUG	-	-	-	11.7	-	-	-	1.2	-
Blowdowns and maintenance venting	BD	BD	-	-	-	5.8	-	-	-	0.1	-
Total (without Fugitives):			64.3	54.6	0.3	65.3	1.8	1.8	1.8	7.2	4.3
Total (with Fugitives):			64.3	54.6	0.3	82.9	1.8	1.8	1.8	8.5	4.3

^A Abbreviations:

PM: filterable and condensable particulate matter

PM_{2.5}: filterable and condensable particulate matter with an aerodynamic diameter less than or equal to 2.5 microns ($\leq 2.5 \mu\text{m}$)

PM₁₀: filterable and condensable particulate matter with an aerodynamic diameter less than or equal to 10 microns ($\leq 10 \mu\text{m}$) including PM_{2.5}

SO₂: 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

As shown in Table 2, the facility 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 August 9, 2024. The Department has reviewed these calculations and believes they accurately represent the proposed facility operations.

The facility PTE is based on enforceable emissions restrictions put in place on the two natural gas-fired compressor engines and the condensate truck loadout, limiting the allowable amount of CO and VOC emissions. These restrictions mean the facility will be a synthetic minor source of air pollution, as the emissions are limited to below major source thresholds for both the prevention of significant deterioration (PSD) and Title V programs.

Rules Analysis**Potentially Applicable Rules and Expected Compliance Status**

A. NDAC 33.1-15-01 – General Provisions:

Multiple topics are included in the General Provisions chapter: entry onto premises - authority, variances, circumvention, severability, land use plans and zoning regulations (only to provide air quality information), measurement of air contaminants, shutdown and malfunction of an installation - requirements for notification, time schedule for compliance, prohibition of air pollution, confidentiality of records, enforcement, and compliance certifications.

Applicability and Expected Compliance

Based on the review of the information provided, the facility will comply with all applicable sections of this rule.

B. NDAC 33.1-15-02 – Ambient Air Quality Standards:

The facility must comply with the North Dakota and Federal Ambient Air Quality Standards (AAQS). In addition to these standards, compliance with the “Criteria Pollutant Modeling Requirements for a Permit to Construct” guidelines¹.

Applicability and Expected Compliance

The facility is not subject to PSD nor does the facility’s PTE trigger the modeling thresholds listed in the “Criteria Pollutant Modeling Requirements for a Permit to Construct”, therefore, preconstruction modeling for this facility was not required. Based on the facility PTE and proposed stack heights, compliance with the ambient air quality standards is expected to be maintained.

C. NDAC 33.1-15-03 – Restriction of Emission of Visible Air Contaminants:

This chapter requires all non-flare sources from new facilities to comply with an opacity limit of 20% except for one six-minute period per hour when 40% opacity is permissible. This chapter also requires facility flares to comply with an opacity limit of 20% except for one six-minute period per hour when 60% opacity is permissible. Lastly, this chapter restricts the opacity of fugitive emissions transported off property to 40% except for one six-minute period per hour when 60% opacity is permissible. This chapter also contains exceptions under certain circumstances and provides the method of measurement to determine compliance with the referenced limits.

¹ See October 6, 2014, Criteria Pollutant Modeling Requirements for a Permit to Construct. Available at: https://www.deq.nd.gov/publications/AQ/policy/Modeling/Criteria_Modeling_Memo.pdf

Applicability and Expected Compliance

Based on Department experience with the non-flare sources, the facility is expected to comply with the 20% opacity limit. Additionally, based on Department experience with flares, the flare is expected to comply with the requirements in 40 CFR §60.18(c) through (f). See Condition 2.D of ACP-18262 v1.0.

D. NDAC 33.1-15-04 – Open Burning:

No person may dispose of refuse and other combustible material by open burning, or cause, allow, or permit open burning of refuse and other combustible material, except as provided for in Section 33.1-15-04-02 or 33.1-15-10-02, and no person may conduct, cause, or permit the conduct of a salvage operation by open burning.

Applicability and Expected Compliance

The facility is subject to this chapter and will comply with all open burning regulations.

E. NDAC 33.1-15-05 – Emissions of Particulates Matter Restricted:

This chapter establishes particulate matter emission limits and restrictions for industrial process equipment and fuel burning equipment used for indirect heating.

Applicability and Expected Compliance

Since the fuel burning equipment used for indirect heating is fired on gaseous fuels, the particulate matter limits in this chapter do not apply. It should be noted that combustion of gaseous fuels in the units is expected to result in extremely low particulate matter emissions that are well below the allowable levels established by this chapter.

F. NDAC 33.1-15-06 – Emissions of Sulfur Compounds Restricted:

This chapter applies to any installation in which fuel is burned and the SO₂ emissions are substantially due to the sulfur content of the fuel; and in which the fuel is burned primarily to produce heat. This chapter is not applicable to installations which are subject to an SO₂ emission limit under Chapter 33.1-15-12, Standards for Performance for New Stationary Sources, or installations which burn pipeline quality natural gas.

Applicability and Expected Compliance

The facility is exempt from this chapter since each engine (EUs C-1 & C-2) will be fired on gas containing no more than 2 grains of sulfur per 100 standard cubic feet.

G. NDAC 33.1-15-07 – Control of Organic Compounds Emissions:

This chapter establishes requirements for the construction of organic compound facilities and the disposal of organic compounds gas and vapor generated as waste resulting from storage, refining, or processing operations at the facility.

Applicability and Expected Compliance

The stationary methanol tank (MTK-1) will comply with this chapter by equipping and operating the tank with a submerged fill pipe.

The condensate truck loadout (EU TL-1) has the potential to handle over 20,000 gallons per day² of volatile organic liquids and will comply with this chapter by equipping and operating the loadout facility with a submerged filling arm or other vapor emissions control system. See ACP-18262 v1.0 Condition 3.A.

For leak detection and repair of equipment in GHG and VOC service (EU FUG), the facility will comply with the applicable requirements under New Source Performance Standard (NSPS) Subpart OOOOb – Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After December 6, 2022. The facility will also comply with the pumps and compressors provision by installing and maintaining appropriate seals for their service and operating conditions.

For the facility flare (EU FL-1), the facility will comply with this chapter by equipping and operating an automatic igniter or a continuous burning pilot. Additionally, the flare will control organic compounds generated from the three condensate tanks (EUs TK-1 through TK-3) and the produced water tank (EU WTK-1).

H. NDAC 33.1-15-08 – Control of Air Pollution from Vehicles and Other Internal Combustion Engines:

This chapter restricts the operation of internal combustion engines which emit from any source unreasonable and excessive smoke, obnoxious or noxious gas, fumes or vapor. This chapter also prohibits the removal or disabling of motor vehicle pollution control devices.

Applicability and Expected Compliance

The engines (EUs C-1 & C-2) are also subject to opacity requirements under NDAC 33.1-15-03-02 and subject to the requirements of NSPS Subpart JJJJ. As a result of expected compliance with these provisions, the engines are not expected to emit any unreasonable and excessive smoke, obnoxious or noxious gases, fumes, or vapor.

I. NDAC 33.1-15-09 – [repealed]

J. NDAC 33.1-15-10 – Control of Pesticides:

This chapter provides restrictions on pesticide use and restrictions on the disposal of surplus pesticides and empty pesticide containers.

² Condensate loadout is restricted to 250,000 barrels per year on a 12-month rolling average, equivalent to ~29,000 gallons per day.

Applicability and Expected Compliance

The facility is subject to this chapter and is expected to comply with all applicable requirements should pesticides be used.

K. NDAC 33.1-15-11 – Prevention of Air Pollution Emergency Episodes:

When an air pollution emergency episode is declared by the Department, the facility shall comply with the requirements in Chapter 33.1-15-11 of the North Dakota Air Pollution Control (NDAPC) rules.

L. NDAC 33.1-15-12 – Standards of Performance for New Stationary Sources [40 Code of Federal Regulations Part 60 (40 CFR Part 60)]:

This chapter adopts most of the Standards of Performance for New Stationary Sources (NSPS) under 40 CFR Part 60. The Nighthawk Compressor Station is subject to the following subparts under 40 CFR Part 60 which have been adopted by North Dakota as of July 1, 2019:

Subpart A – General Provisions

Subpart A contains general requirements for plan reviews, notification, recordkeeping, performance tests, reporting, monitoring and general control device requirements.

Applicability and Expected Compliance

The facility will comply with the general provisions of Subpart A through submission of timely notifications, performance testing, reporting, and following the general control device and work practice requirements under Subpart A. In addition, any changes to the facility after it is built will be evaluated with respect to this subpart as well as others.

Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

Subpart JJJJ establishes emissions standards (NO_x, CO, VOC) and compliance schedules for all new, modified and reconstructed stationary spark ignition (SI) internal combustion engines (ICE) and equipment manufactured on or after July 1, 2007, regardless of size. The subpart applies to manufactures, owners, and operators of such engines and equipment. SI ICE are categorized in this subpart by usage, size and fuel type.

Applicability and Expected Compliance

The natural gas compressor engines (EUs C-1 & C-2) are subject to the requirements of NSPS Subpart JJJJ. The facility engines are each rated 2,750 horsepower (hp), will be constructed in 2024, and will be equipped with oxidation catalysts.

Subpart JJJJ requires each engine to comply with the following emissions standards:

- 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
- VOC of 0.7 g/hp-hr or 60 ppmvd @ 15% O₂

Beyond the Subpart JJJJ limits, the facility is restricted to lower engine emissions limits to avoid major source thresholds under Title V. As a result, Condition 3 of ACP-18262 v1.0 established the following limits:

- CO of 1.13 g/hp-hr
- VOC of 0.6 g/hp-hr

To demonstrate compliance with the above limits, the facility must conduct emissions testing every 8,760 hours of operations or every three years, whichever comes first.

The facility is also expected to comply with Subpart JJJJ requirements by properly maintaining and operating an air-to-fuel ratio controller and keeping a maintenance plan and records of conducted maintenance and, to the extent practicable, will maintain and operate the engines in a manner consistent with good air pollution control for minimizing emissions.

Subpart OOOOb – Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After December 6, 2022

Subpart OOOOb establishes emission standards and compliance schedules for the control of the pollutant greenhouse gases (GHG). The greenhouse gas standard in this subpart is in the form of a limitation on emissions of methane from affected facilities in the crude oil and natural gas source category that commence construction, modification, or reconstruction after December 6, 2022. This subpart also establishes emission standards and compliance schedules for the control of volatile organic compounds (VOC) and sulfur dioxide (SO₂) emissions from affected facilities in the crude oil and natural gas source category that commence construction, modification, or reconstruction after December 6, 2022.

Applicability and Expected Compliance

The natural gas engine (EUs C-1 & C-2) driven compressors, condensate tanks (EUs TK-1 through TK-3), produced water tank (EU WTK-1), flare (EU FL-1), and fugitive emissions (EU FUG) are subject to the requirements of Subpart OOOOb.

The natural gas engine (EUs C-1 & C-2) driven compressors are considered affected facilities under Subpart OOOOb. The compressors are expected to comply with the applicable standards for reciprocating compressors under Subpart OOOOb.

The three condensate tanks (EUs TK-1 through TK-3) and produced water tank (EU WTK-1) emissions are controlled via flare (EU FL-1) and are expected to comply with Subpart OOOOb.

The fugitive emissions (EU FUG) components that have a potential to emit GHG and VOC are considered affected facilities under Subpart OOOOb. The facility is expected to comply with the applicable fugitive emissions VOC standards through development and implementation of a leak detection and repair (LDAR) program in compliance with Subpart OOOOb requirements. The LDAR program, at a minimum, shall require monitoring, reporting, and recordkeeping.

- M. NDAC 33.1-15-13 – Emission Standards for Hazardous Air Pollutants [40 Code of Federal Regulations Part 61 (40 CFR Part 61)]:

This chapter discusses emission standards for hazardous air pollutants. It specifically incorporates a majority of the subparts and appendices of the National Emission Standards for Hazardous Air Pollutants (NESHAP) under 40 CFR Part 61 as of July 2, 2010.

Applicability and Expected Compliance

The facility does not appear to have any applicable requirements under this chapter.

- N. NDAC 33.1-15-14 – Designated Air Contaminant Sources, Permit to Construct, Minor Source Permit to Operate, Title V Permit to Operate:

This chapter designates that federally regulated sources are required to obtain a Permit to Construct and a Permit to Operate and comply with specific emission control and air quality standards.

Applicability and Expected Compliance

The facility has submitted an application for a permit to construct and has met all requirements necessary to obtain a permit to construct. The facility will be considered a synthetic minor source via federally enforceable restrictions limiting the VOC emissions below 100 tons per year.

The permit must undergo public comment per NDAC 33.1-15-14-06.5.a.

Once the facility completes construction and meets the permit to construct requirements, a facility inspection will be performed by the Department. Pending a satisfactory facility inspection, the facility will be issued a permit to operate by the Department.

- O. NDAC 33.1-15-15 – Prevention of Significant Deterioration of Air Quality [40 CFR 52.21]:

This chapter adopts the federal provisions of the Prevention of Significant Deterioration of air quality (PSD) program (40 CFR 52.21). A facility is subject to PSD review if it is classified as a “major stationary source” under Chapter 33.1-15-15.

Applicability and Expected Compliance

This facility is not classified as a “major stationary source” under 40 CFR 52.21(b)(1)(i)(a) and is therefore only subject to PSD review if emissions of a regulated new source review (NSR) pollutant³ exceed 250 tpy (excluding fugitive emissions). The PTE for this facility, as shown in Table 2, is below the 250 tpy threshold and therefore not subject to PSD review.

P. NDAC 33.1-15-16 – Restriction of Odorous Air Contaminants:

This chapter restricts the discharge of objectionable odorous air contaminants which measures seven odor concentration units or greater outside the property boundary. The emission of hydrogen sulfide is also addressed with strict concentration limitations. The chapter also establishes the method of measurement using certified inspectors, scentometers, and other approved instruments.

Applicability and Expected Compliance

Based on Department experience with sources having similar emission units, processes, and low hydrogen sulfide concentrations, the facility is expected to comply with this chapter.

Q. NDAC 33.1-15-17 – Restriction of Fugitive Emissions:

This Chapter restricts fugitive emissions from particulate matter or other visible air contaminants and gaseous emissions that would violate Chapter 2 (ambient air quality standards), Chapter 15 (PSD), Chapter 16 (odor), or Chapter 19 (visibility).

Applicability and Expected Compliance

The facility will be required to take reasonable precautions to prevent fugitive emissions in violation of the above referenced NDAC chapters.

R. NDAC 33.1-15-18 – Stack Heights:

This chapter restricts the use of stack heights above good engineering practices (GEP). The chapter primarily adopts federal regulations listed under 40 CFR 51.100(ii). This chapter also restricts the use of dispersion techniques to affect the concentration of a pollutant in the ambient air. Demonstrations of good engineering practice stack heights must be made available for review.

Applicability and Expected Compliance

The proposed stack heights at the facility do not exceed GEP and will not use dispersion techniques to affect the pollutant concentration in the ambient air.

³ See 40 CFR 52.21(b)(50). Available at: [https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-52/subpart-A/section-52.21#p-52.21\(b\)\(50\)](https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-52/subpart-A/section-52.21#p-52.21(b)(50))

The stack heights at the facility are listed in the following table:

Emission Unit (EU)	Emission Point (EP)	Minimum Stack Height (Feet)
C-1	C-1	30
C-2	C-2	30
FL-1	FL-1	50

S. NDAC 33.1-15-19 – Visibility Protection:

This chapter outlines regulations regarding visibility protection and applies to new major stationary sources as defined in Section 33.1-15-15-01. It contains provisions regarding visibility impact analysis, visibility models, notification requirements for permit applications, review by federal land managers, permit issuance criteria, and visibility monitoring.

Applicability and Expected Compliance

The facility is not a new major stationary source and therefore is not subject to the requirements of this chapter. Given the minor source levels of the visibility impairing air pollutants, such as NO_x, SO₂, and PM_{2.5}, it is expected that the facility will not adversely contribute to visibility impairment within the three units of the Theodore Roosevelt National Park (nearest federal Class I areas) or at the Lostwood National Wildlife Refuge.

T. NDAC 33.1-15-20 – Control of Emissions from Oil and Gas Well Production Facilities:

The facility is not an oil or gas well facility and is therefore not subject to the requirements of this chapter.

U. NDAC 33.1-15-21 – Acid Rain Program:

This chapter adopts the acid rain provisions of the Clean Air Act specified under 40 CFR Parts 72-78. The facility is not subject to the acid rain provision as they are not an electric utility.

V. NDAC 33.1-15-22 – Emissions Standards for Hazardous Air Pollutants for Source Categories [40 Code of Federal Regulations Part 63 (40 CFR Part 63)]:

This chapter adopts most of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories under 40 CFR Part 63. These standards typically apply to major sources of air pollution that are in a regulated source category. In addition to the major source requirements, some of the regulations have “area source” standards (for non-major sources). Some of the area source standards have not been adopted by the Department and compliance will be determined by the United States Environmental Protection Agency (USEPA) (i.e. 40 CFR 63, Subpart ZZZZ area source provisions have not been adopted by the Department).

Applicability

The facility's potential HAP emissions are less than 10 tons/year of any single HAP and are less than 25 tons/year of any combination of HAPs, so the facility is an area (minor) source of HAPs. As shown in the Table 2, total potential HAPs from the facility are approximately 8.5 tons/year. The greatest single potential HAP is formaldehyde at less than 5 tons/year.

Subpart A – General Provisions

Subpart A contains general requirements for prohibited activities and circumvention, preconstruction review and notification, standards and maintenance requirements, performance tests, monitoring, recordkeeping, reporting, and control device work practice requirements.

Applicability and Expected Compliance

The facility will comply with the general provisions of Subpart A through submission of timely notifications, performance testing, monitoring, recordkeeping, reporting, and following the control device work practice requirements under Subpart A.

Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion EnginesApplicability and Expected Compliance

The facility engines (EUs C-1 & C-2) are subject to the requirements under this subpart. The requirements of Subpart ZZZZ for the engines are met by complying with the requirements of NDAC 33.1-15-12 [40 CFR 60], Subpart JJJJ.

W. NDAC 33.1-15-23 – Fees:

This chapter requires a filing fee of \$325 for permit to construct applications, plus any additional fees based on actual processing costs. The additional fees based on processing costs will be assessed upon issuance of the draft permit to construct. The annual operating permit fee is also applicable.

The applicant has paid the \$325 filing fee and may be required to pay the additional fees associated with the permit processing.

X. NDAC 33.1-15-24 – Standards for Lead-Based Paint Activities:

The facility will not perform any lead-based painting and is therefore not subject to this chapter.

Y. NDAC 33.1-15-25 – Regional Haze Requirements:

This chapter is specific to existing stationary sources or groups of sources which have the potential to “contribute to visibility impairment” as defined in Section 33.1-15-25-01.2. Existing stationary sources or groups of sources determined to contribute to visibility impairment may be required to implement emissions reduction measures to help the Department make reasonable progress toward North Dakota’s reasonable progress goals established in accordance with 40 CFR 51.308.

Applicability and Expected Compliance

The facility is an existing source. Based on low PTE of visibility impairment pollutants, the facility is not expected to contribute to visibility impairment. Therefore, the facility is not subject to the requirements of this chapter.

Summary:

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 Nighthawk Compressor Station following completion of a 30-day public comment period. The public comment period will run from December 10, 2024, through January 9, 2025.

Update post comment period:

[Reserved]

Date of Draft Analysis: December 10, 2024

Date of Final Analysis: [Reserved]

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