west virginia department of environmental protection

Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
(304) 926-0475

Austin Caperton, Cabinet Secretary
dep.wv.gov

March 22, 2018

Meghan Yingling
65 Professional Place, Suite 200
Bridgeport, WV 26330

RE: Approved Registration G70-D
G70-D298
Arsenal Resources LLC
Pritt South Site
Facility ID No. 033-00271

Dear Ms. Yingling,

The Director has determined that the submitted Registration Application and proposed modification and operation of an oil and natural gas production facility demonstrates eligibility and compliance with the requirements, provisions, standards and conditions of General Permit G70-D and hereby grants General Permit registration authorizing the proposed activity.

General Permit G70-D can be accessed electronically at www.dep.wv.gov/daq/permitting/Pages/airgeneralpermit.aspx. Hard copies are available upon request by contacting Danielle Wentz at (304)926-0499 ext. 1193.

Please be aware of the actions required in Monitoring Requirements, Testing Requirements, Recordkeeping Requirements, and the Reporting Requirements.

Should you have any questions, please contact the undersigned engineer at (304)926-0499 ext. 1224 or David.J.Keatley@wv.gov.

Sincerely,

David Keatley
Permit Writer - NSR Permitting

Enclosures: Registration G70-D298

Meghan Yingling
myingling@arsenalresources.com

Grant Morgan
Grant.Morgan@erm.com

West Virginia Department of Environmental Protection
Division of Air Quality
Austin Caperton
Cabinet Secretary

Class II General Permit
G70-D Registration to Construct

for the
Prevention and Control of Air Pollution in regard to the
Construction, Modification, Relocation, Administrative Update and
Operation of Natural Gas Production Facilities Located at the Well Site

The permittee identified at the facility listed below is authorized to construct the stationary sources in accordance with all terms and conditions of General Permit G70-D.

G70-D298

Issued to:
Arsenal Resources LLC
Pritt South Site
033-00271

William F. Durham
Director, Division of Air Quality

Issued: March 22, 2018

Facility Location:	Bridgeport, Harrison County, West Virginia
Mailing Address:	65 Professional Place, Suite 200 Bridgeport, WV 26330
NAICS Code:	211111
SIC Code:	1311
Longitude Coordinate:	-80.18706°
Latitude Coordinate:	39.24576°
Registration Type:	Construction
Description of Change:	Installation and operation of: fourteen (14) 1.0-mmBtu/hr line heaters, two (2) 210-bbl sand blowdown tanks, thirteen (13) 400-bbl produced liquid tanks, two (2) 0.0007-mmBtu/hr thermoelectric generators, and one (1) produced liquid loadout.

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit or registration issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

The source is not subject to 45CSR30.

The registered natural gas production facility granted Class II General Permit registration by the Director shall not have a potential to emit any criteria pollutant in an amount equal to or greater than the following:

Pollutant	**Maximum Annual Emission Limit (tons/year)**
Nitrogen Oxides	50
Carbon Monoxide	80
Volatile Organic Compounds	80
Particulate Matter – 10/2.5	20
Sulfur Dioxide	20
Any Single Hazardous Air Pollutant	8
Total Hazardous Air Pollutants	20

G70-D Annual Certification. Annually from the date of the original registration issuance, the registrant shall prepare and submit a G70 Annual Certification for the previous year, addressing the potential emissions from the facility (using a generally accepted model or calculation methodology) and an updated Emission Units/ERD/APCD table (if necessary). The registrant shall pay an annual $1,000 certification fee to the Director. The fee shall be paid by negotiable instrument made payable to the "DEP-Division of Air Quality".

The G70-D Annual Certification is due by March 22nd of each calendar year.

Permit Section Applicability for the Registrant

All registered facilities under General Permit G70-D are subject to Sections 1.0, 2.0, 3.0, and 4.0 of General Permit G70-D.

The following additional sections of General Permit G70-D apply to the registrant:

GENERAL PERMIT G70-D APPLICABLE SECTIONS	
☒Section 5.0	Gas and Oil Well Affected Facility (NSPS, Subpart OOOO/OOOOa)
☒Section 6.0	Storage Vessels Containing Condensate and/or Produced Water[1]
☐Section 7.0	Storage Vessel Affected Facility (NSPS, Subpart OOOO/OOOOa)
☐Section 8.0	Control Devices and Emission Reduction Devices not subject to NSPS Subpart OOOO/OOOOa and/or NESHAP Subpart HH
☒Section 9.0	Small Heaters and Reboilers not subject to 40CFR60 Subpart Dc
☐Section 10.0	Pneumatic Controllers Affected Facility (NSPS, Subpart OOOO/OOOOa)
☐Section 11.0	Pneumatic Pump Affected Facility (NSPS, Subpart OOOOa)
☒Section 12.0	Fugitive Emissions GHG and VOC Standards (NSPS, Subpart OOOOa)
☐Section 13.0	Reciprocating Internal Combustion Engines, Generator Engines
☒Section 14.0	Tanker Truck/Rail Car Loading[2]
☐Section 15.0	Glycol Dehydration Units[3]

1 *Applicants that are subject to Section 6 may also be subject to Section 7 if the applicant is subject to the NSPS, Subpart OOOO control requirements or the applicable control device requirements of Section 8.*

2 *Applicants that are subject to Section 14 may also be subject to control device and emission reduction device requirements of Section 8.*

3 *Applicants that are subject to Section 15 may also be subject to the requirements of Section 9 (reboilers). Applicants that are subject to Section 15 may also be subject to control device and emission reduction device requirements of Section 8.*