



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

April 20, 2018

CERTIFIED MAIL

Mr. Daniel Wentworth
Senior Vice President
Blue Racer Midstream, LLC
5949 Sherry Lane Road
Dallas, Texas 75225

Re: Final Findings and Orders for air pollution
violations

Ohio EPA APR 20 '18
Entered Directors Journal

Dear Mr. Wentworth,

Transmitted herewith are the Final Findings and Orders ("Orders") of the Director of Ohio EPA concerning the above-referenced matter.

Please note that the effective date of the Orders is the date that the Orders were entered into the Ohio EPA Director's journal, which is the date that is stamped on the first page of the Orders.

Sincerely,

A handwritten signature in black ink, appearing to read "James Kavalec", is written over a vertical line that extends from the word "Sincerely,".

James Kavalec, Manager
Compliance/Enforcement Section
Division of Air Pollution Control

ec: James Lee, PIC
Brandon Schwendeman, DAPC
John Paulian, DAPC
Lee Tullis, DAPC
Kim Rhoads, Legal
John Rochotte, NWDO

**BEFORE THE
OHIO ENVIRONMENTAL PROTECTION AGENCY**

In the Matter of:

**Blue Racer Midstream, LLC
5949 Sherry Lane
Dallas, Texas 75225**

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:
:
:

**Director's Final Findings
and Orders**

This is to be a true and accurate copy of the original documents as filed in the records of the Ohio Environmental Protection Agency.

PREAMBLE

It is agreed by the parties hereto as follows:

By:  Date: 4-20-18

I. JURISDICTION

These Director's Final Findings and Orders ("Orders") are issued to Blue Racer Midstream, LLC ("Respondent") pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency ("Ohio EPA") under Ohio Revised Code ("ORC") §§ 3704.03 and 3745.01.

II. PARTIES BOUND

These Orders shall apply to and be binding upon Respondent and successors in interest liable under Ohio law. No change in ownership of Respondent or any of the facilities (as hereinafter defined) shall in any way alter Respondent's obligations under these Orders.

III. DEFINITIONS

Unless otherwise stated, all terms used in these Orders shall have the same meaning as defined in ORC Chapter 3704 and the rules promulgated thereunder.

IV. FINDINGS

The Director of Ohio EPA makes the following findings:

1. Respondent, with a headquarters office located at 5949 Sherry Lane Road, Dallas, Texas, owns and operates the following midstream gas and oil processing facilities in Ohio. All of these facilities are classified as non-Title V.

#	Facility (ID)	Address	County
1	Harrison Co Field Station #1 (0634005091)	OH-9 and St. Clair Avenue Cadiz, Ohio 43907	Harrison
2	Harrison Co Field Station #2 (0634005094)	Toot Rd. and Cadiz-Jewett Rd. Cadiz, Ohio 43907	Harrison
3	Harrison Co Field Station #5 (0634005114)	OH-9 and S Main St. Cadiz, Ohio 43907	Harrison
4	Harrison Co Field Station #6 (0634005115)	OH-9 and S Main St. Cadiz, Ohio 43907	Harrison
5	Athens B Dehydration Facility (0634005105)	OH- 519 to CR-264 S New Athens, Ohio 43981	Harrison
6	Cadiz C Dehydration Facility (0634005143)	OH-11 W to OH-9 Cadiz, Ohio 43907	Harrison
7	Berne Plant (0656065005)	Swazey Road Lewisville, Ohio 43788	Monroe
8	Guernsey Facility (0679005011)	CR 5 Port Washington, Ohio 43837	Tuscarawas
9	Guernsey Field Station #1 (0630005037)	I-70E and US-40E Fairview, Ohio 43736	Guernsey
10	Noble Co Field Station #2 (0661005032)	OH-724 and OH-45 Summerfield, Ohio 43788	Noble
11	Noble Co Field Station #1 (0661005031)	OH-146 and CR-51 Summerfield, Ohio 43788	Noble
12	Flushing A Dehydration Facility (0607075007)	OH-331 and Lease Rd. Flushing, Ohio 43977	Belmont
13	Belmont Field Station #1 (0607015022)	OH-800 and Lease Rd. Flushing, Ohio 43977	Belmont

2. ORC § 3704.05(C) prohibits any person who is a holder of a permit issued by the Director of Ohio EPA pursuant to ORC § 3704.03 from violating any of its terms and conditions.

3. ORC § 3704.05(G) prohibits a person from violating any order, rule, or determination of the Director that was issued, adopted, or made under ORC Chapter 3704.

4. The Standards of Performance for New Stationary Spark Ignition Internal Combustion Engines (40 CFR Part 60, Subpart JJJJ) requires, in part, the owner or operator of a stationary spark ignition internal combustion engine to meet certain requirements and emissions limits based on the engine rating and manufacture date.

5. The requirements of 40 CFR Part 60, Subpart JJJJ are incorporated in Respondent's permit-to-install and operate ("PTIO") issued for the several of the above-referenced facilities.

6. The National Emissions Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities (40 CFR Part 63, Subpart HH) are incorporated as applicable requirements in Respondent's PTIO issued for the several of the above facilities.

7. The Standards of Performance for New Stationary Sources for Crude Oil and Natural Gas Production (40 CFR Part 60, Subpart OOOO) are incorporated as applicable requirements in Respondent's PTIO issued for the several of the above facilities.

Facility #1: Harrison Co Field Station #1 (0634005091)

8. The following emissions units at Facility #1 are the subject of these Orders and are subject to Ohio EPA rules and regulations.

EUs ID	Description	Date Installed
F001	Equipment and pipeline leaks	09/04/2014
P001	Dehydration system	09/04/2014

9. PTIO P0116808 that was issued on June 18, 2014, requires Respondent to provide the following information concerning EU P001 as part of the annual Permit Evaluation Report ("PER"):

- The annual facility natural gas or hydrocarbon liquid throughput during the year of the report;
- Identification of the kind of liquid glycol used in the dehydrator during the year of the report (ethylene glycol, diethylene glycol, or triethylene glycol); and
- Additional information as identified in the PTIO only if using triethylene glycol.

10. Respondent failed to provide Ohio EPA with the required information for EU P001 as part of the 2014, 2015 and 2016 PERs, in violation of the terms and conditions of the PTIO and ORC § 3704.05(C). Respondent submitted revised 2014, 2015 and 2016 PERs on November 17, 2017.

11. PTIO P0116808, requires Respondent to develop and implement a leak detection and repair plan program for EU F001 that meets several requirements. One of the requirements is to complete the initial monitoring within 90 days of startup and quarterly thereafter for the first year.

12. Respondent failed to complete the initial monitoring for EU F001 by September 16, 2014, in violation of the terms and conditions of the PTIO and ORC § 3704.05(C). The initial monitoring for EUF001 was completed on June 7, 2016 (630 days late).

13. PTIO P0116808 requires Respondent to develop and implement a site-specific work practice plan ("WPP") designed to minimize or eliminate fugitive dust from EU F002 and submit the plan to Ohio EPA within 30 days of the issuance of the permit.

14. In violation of the terms and conditions of the PTIO and ORC § 3704.05(C), Respondent failed to submit the WPP for EU F002 by July 18, 2014. The WPP was received by Ohio EPA Southeast District office ("SEDO") on November 17, 2017.

15. SEDO sent a NOV letter to Respondent for the violations at Facility #1 on September 14, 2017.

Facility #2: Harrison Co Field Station #2 (0634005094)

16. The following emissions units at Facility #2 are the subject of these Orders and are subject to Ohio EPA rules and regulations.

EUs ID	Description	Date Installed
F001	Equipment and pipeline leaks	09/01/2014
P001	Dehydration system	09/01/2014

17. PTIO P0117412 that was issued on August 6, 2014, required Respondent to provide the following information concerning EU P001 as part of the annual PER:

- The annual facility natural gas or hydrocarbon liquid throughput during the year of the report;
- Identification of the kind of liquid glycol used in the dehydrator during the year of the report (ethylene glycol, diethylene glycol, or triethylene glycol); and
- Additional information as identified in the PTIO only if using triethylene glycol.

18. Respondent failed to provide Ohio EPA with the required information for EU P001 as part of the 2014, 2015 and 2016 PERs, in violation of the terms and conditions of the PTIO and ORC § 3704.05(C). Respondent submitted revised 2014, 2015 and 2016 PERs on November 18, 2017.

19. PTIO P0117412, requires Respondent to develop and implement a leak detection and repair plan program for EU F001 that meets several requirements. One of the requirements is to complete the initial monitoring within 90 days of startup and quarterly thereafter for the first year.

20. Respondent failed to complete the initial monitoring for EU F001 by November 30, 2014, in violation of the terms and conditions of the PTIO and ORC § 3704.05(C). The initial monitoring for EUF001 was completed on June 3, 2016 (551 days late).

21. SEDO sent a NOV letter to Respondent for the violations at Facility #2 on September 14, 2017.

Facility #3: Harrison Co Field Station #5 (0634005114)

22. The following emissions units at Facility #3 are the subject of these Orders and are subject to Ohio EPA rules and regulations.

EUs ID	Description	Date Installed
F001	Equipment and pipeline leaks	07/03/2015
P001	Dehydration system	07/03/2015

23. PTIO P0118911 that was issued on June 5, 2015, requires Respondent to provide the following information concerning EU P001 as part of the annual PER:

- The annual facility natural gas or hydrocarbon liquid throughput during the year of the report;
- Identification of the kind of liquid glycol used in the dehydrator during the year of the report (ethylene glycol, diethylene glycol, or triethylene glycol); and
- Additional information as identified in the PTIO only if using triethylene glycol.

24. Respondent failed to provide Ohio EPA with the required information for EU P001 as part of the 2015 and 2016 PERs, in violation of the terms and conditions of the PTIO and ORC § 3704.05(C). Respondent submitted revised PERs for 2015 and 2016 on November 18, 2017.

25. PTIO P0118911, requires Respondent to develop and implement a leak detection and repair plan program for EU F001 that meets several requirements. One of the requirements is to complete the initial monitoring within 90 days of startup and quarterly thereafter for the first year.

26. Respondent failed to complete the initial monitoring for EU F001 by October 1, 2015, in violation of the terms and conditions of the PTIO and ORC § 3704.05(C). The initial monitoring for EUF001 was completed on June 7, 2016 (250 days late).

27. SEDO sent a NOV letter to Respondent for the violations at Facility #3 on September 14, 2017.

Facility #4: Harrison Co Field Station #6 (0634005115)

28. The following emissions units at Facility #4 are the subject of these Orders and are subject to Ohio EPA rules and regulations.

EUs ID	Description	Date Installed
F001	Equipment and pipeline leaks	08/21/2015
P001	Dehydration system	08/21/2015

29. PTIO P0118912 that was issued on June 23, 2015, requires Respondent to provide the following information concerning EU P001 as part of the annual PER:

- The annual facility natural gas or hydrocarbon liquid throughput during the year of the report;
- Identification of the kind of liquid glycol used in the dehydrator during the year of the report (ethylene glycol, diethylene glycol, or triethylene glycol); and
- Additional information as identified in the PTIO only if using triethylene glycol.

30. Respondent failed to provide Ohio EPA with the required information for EU P001 as part of the 2015 and 2016 PERs, in violation of the terms and conditions of the PTIO and ORC § 3704.05(C). Respondent submitted revised PER for 2015 and 2016 on November 18, 2017.

31. PTIO P0118912, requires Respondent to develop and implement a leak detection and repair plan program for EU F001 that meets several requirements. One of the requirements is to complete the initial monitoring within 90 days of startup and quarterly thereafter for the first year.

32. Respondent failed to complete the initial monitoring for EU F001 by September 21, 2015, in violation of the terms and conditions of the PTIO and ORC § 3704.05(C). The initial monitoring for EUF001 was completed on June 7, 2016 (260 days late).

33. SEDO sent a NOV letter to Respondent for the violations at Facility #4 on September 14, 2017.

Facility #5: Athens B Dehydration Facility (0634005105)

34. The following emissions units at Facility #5 are the subject of these Orders and are subject to Ohio EPA rules and regulations.

EUs ID	Description	Date Installed
F001	Equipment and pipeline leaks	12/13/2014
P001	Dehydration system	12/13/2014

35. PTIO P0117855 that was issued on December 8, 2014, requires Respondent to provide the following information concerning EU P001 as part of the annual PER:

- The annual facility natural gas or hydrocarbon liquid throughput during the year of the report;
- Identification of the kind of liquid glycol used in the dehydrator during the year of the report (ethylene glycol, diethylene glycol, or triethylene glycol); and
- Additional information as identified in the PTIO only if using triethylene glycol.

36. Respondent failed to provide Ohio EPA with the required information for EU P001 as part of the 2014, 2015 and 2016 PERs, in violation of the terms and conditions of the PTIO and ORC § 3704.05(C). Respondent submitted revised 2014, 2015, and 2016 PERs on November 18, 2017.

37. PTIO P0117855 requires Respondent to develop and implement a leak detection and repair plan program for EU F001 that meets several requirements. One of the requirements is to complete the initial monitoring within 90 days of startup and quarterly thereafter for the first year.

38. Respondent failed to complete the initial monitoring for EU F001 by March 8, 2015, in violation of the terms and conditions of the PTIO and ORC § 3704.05(C). The initial monitoring for EU F001 was completed on September 6, 2016 (543 days late).

39. PTIO P0117855 requires Respondent to develop and implement a site-specific WPP designed to minimize or eliminate fugitive dust from EU F002 and submit the plan to Ohio EPA within 30 days of the issuance of the permit.

40. In violation of the terms and conditions of the PTIO and ORC § 3704.05(C), Respondent failed to submit the WPP for EU F002 by January 7, 2015. The WPP was received by SEDO on November 18, 2017.

41. SEDO sent a NOV letter to Respondent for the violations at Facility #5 on September 14, 2017.

Facility #6: Cadiz C Dehydration Facility (0634005143)

42. The following emissions units at Facility #6 are the subject of these Orders and are subject to Ohio EPA rules and regulations.

EUs ID	Description	Date Installed
P001	Dehydration system	02/29/2016

43. PTIO P0120177 that was issued on February 29, 2016, requires Respondent to provide the following information concerning EU P001 as part of the annual PER:

- The annual facility natural gas or hydrocarbon liquid throughput during the year of the report;
- Identification of the kind of liquid glycol used in the dehydrator during the year of the report (ethylene glycol, diethylene glycol, or triethylene glycol); and
- Additional information as identified in the PTIO only if using triethylene glycol.

44. Respondent failed to provide Ohio EPA with the required information for EU P001 as part of the 2106 PER, in violation of the terms and conditions of the PTIO and ORC § 3704.05(C). Respondent submitted a revised 2016 PER on November 17, 2017.

45. SEDO sent a NOV letter to Respondent for the violations at Facility #6 on September 14, 2017.

Facility #7: Berne Plant (0656065005)

46. The following emissions units at Facility #7 are the subject of these Orders and are subject to Ohio EPA rules and regulations.

EUs ID	Description	Date Installed
F001	Unpaved roadways and parking areas	01/22/2015
P801	Site Fugitive emissions	01/22/2015

47. PTIO P0116371 that was issued on September 2, 2014, requires Respondent to develop and implement a site-specific WPP designed to minimize or eliminate fugitive dust from EU F001 and submit the plan to Ohio EPA within 30 days of the issuance of the permit.

48. In violation of the terms and conditions of the PTIO and ORC § 3704.05(C), Respondent failed to submit the WPP for EU F001 by October 2, 2014. The WPP was received by SEDO on December 16, 2016 (806 days late).

49. PTIO P0121257 that was issued on April 26, 2017 (superseded PTIO P0116371 that was issued September 9, 2014), requires Respondent to comply with the provisions of 40 CFR 60.487a (reporting requirements) applicable to EU P801. One of the provisions of 40 CFR 60.487a requires each owner or operator to submit semiannual reports beginning 6 months after the initial startup date.

50. In violation of the terms and conditions of the PTIO, ORC § 3704.05(C), and 40 CFR 60.487a, Respondent failed to submit the semiannual inspection report for EU P801 that was due by July 22, 2015. The initial semiannual leak detection and repair inspection was conducted on February 1, 2016 (194 days late).

51. SEDO sent a NOV letter to Respondent for the violations at Facility #7 on September 14, 2017.

Facility #8: Guernsey Facility (0679005011)

52. The following emissions units at Facility #8 are the subject of these Orders and are subject to Ohio EPA rules and regulations.

EUs ID	Description	Date Installed
P001	Dehydration system	12/01/2013

53. PTIO P0115349 that was issued on October 28, 2013, requires Respondent to provide the following information concerning EU P001 as part of the annual PER:

- The annual facility natural gas or hydrocarbon liquid throughput during the year of the report;
- Identification of the kind of liquid glycol used in the dehydrator during the year of the report (ethylene glycol, diethylene glycol, or triethylene glycol); and
- Additional information as identified in the PTIO only if using triethylene glycol.

54. Respondent failed to provide Ohio EPA with the required information for EU P001 as part of the 2013 and 2014 PERs and failed to submit the 2015 and 2016 PERs, in violation of the terms and conditions of the PTIO and ORC § 3704.05(C). Respondent submitted revised 2013 and 2014 PERs, and 2015 and 2016 PERs on November 18, 2017.

55. SEDO sent a NOV letter to Respondent for the violations at Facility #8 on September 14, 2017.

Facility #9: Guernsey Field Station #1 (0630005037)

56. The following emissions units at Facility #9 are the subject of these Orders and are subject to Ohio EPA rules and regulations.

EUs ID	Description	Date Installed
F001	Equipment and pipeline leaks	05/31/2014
F002	Unpaved roadways and parking areas	05/31/2014
P001	Dehydration system	05/31/2014

57. PTIO P0116784 that was issued on June 19, 2014, requires Respondent to provide the following information concerning EU P001 as part of the annual PER:

- The annual facility natural gas or hydrocarbon liquid throughput during the year of the report;
- Identification of the kind of liquid glycol used in the dehydrator during the year of the report (ethylene glycol, diethylene glycol, or triethylene glycol); and
- Additional information as identified in the PTIO only if using triethylene glycol.

58. Respondent failed to provide Ohio EPA with the required information for EU P001 as part of the 2014, 2015 and 2016 PERs, in violation of the terms and conditions of the PTIO and ORC § 3704.05(C). Respondent submitted revised 2014, 2015 and 2016 PERs on November 18, 2017.

59. PTIO P0116784 requires Respondent to develop and implement a leak detection and repair plan program for EU F001 that meets several requirements. One of the requirements is to complete the initial monitoring within 90 days of startup and quarterly thereafter for the first year.

60. Respondent failed to complete the initial monitoring for EU F001 by August 29, 2014, in violation of the terms and conditions of the PTIO and ORC § 3704.05(C). The initial monitoring for EU F001 was completed on June 1, 2016 (642 days late).

61. PTIO P0116784 requires Respondent to develop and implement a site-specific WPP designed to minimize or eliminate fugitive dust from EU F002 and submit the plan to Ohio EPA within 30 days of the issuance of the permit.

62. In violation of the terms and conditions of the PTIO and ORC § 3704.05(C), Respondent failed to submit the WPP for EU F002 by July 19, 2014. The WPP was received by SEDO on November 18, 2017.

63. SEDO sent a NOV letter to Respondent for the violations at Facility #9 on September 27, 2017.

Facility #10: Noble Co Field Station #2 (0661005032)

64. The following emissions units at Facility #10 are the subject of these Orders and are subject to Ohio EPA rules and regulations.

EUs ID	Description	Date Installed
F001	Unpaved roadways and parking areas	06/23/2014
P001	Compressor Engine 1	06/23/2014
P002	Compressor Engine 2	06/23/2014
P007	Pigging operations	06/23/2014

65. PTIO P0116427 that was issued on May 27, 2014, requires the emissions from EUs P001 and P002 not to exceed 0.32 g/hp-hr for volatile organic compounds ("VOC").

66. On November 12, 2015, Respondent conducted an emissions test for EU P001 and the emissions rate was 0.53 g/hp-hr for VOC, in violation of the terms and conditions of the PTIO and ORC § 3704.05(C). EU P001 was permanently shut down on October 31, 2016.

67. On November 12, 2015, Respondent conducted an emissions test for EU P002 and the emissions rate was 0.54 g/hp-hr for VOC, in violation of the terms and conditions of the PTIO and ORC § 3704.05(C). Respondent conducted and passed a re-test on November 9, 2016.

68. PTIO P0116427 requires Respondent to develop and implement a site-specific WPP designed to minimize or eliminate fugitive dust from EU F001 and submit the plan to Ohio EPA within 30 days of the issuance of the permit.

69. In violation of the terms and conditions of the PTIO and ORC § 3704.05(C), Respondent failed to submit the WPP for EU F001 by June 27, 2014. The WPP was received by SEDO on November 18, 2017.

70. PTIO P0116427 requires the fugitive VOC emissions from EU P007 not to exceed 0.07 ton per month as a rolling, 12- month average.

71. In violation of the terms and conditions of the PTIO and ORC § 3704.05(C), Respondent has been exceeding the VOC emissions for EU P007 since November 2014. The highest monthly average through April 2017 was 0.42 ton per month. On November 18, 2017, Respondent requested an administrative modification to the PTIO to increase the fugitive VOC emissions to 0.47 ton per month.

72. SEDO sent NOV letters to Respondent for the emissions violations at Facility #10 on January 12, 2016 and for the remaining violations on September 14, 2017.

Facility #11: Noble Co Field Station #1 (0661005031)

73. The following emissions units at Facility #11 are the subject of these Orders and are subject to Ohio EPA rules and regulations.

EUs ID	Description	Date Installed
P001	Compressor engine 1	07/10/2014
P002	Compressor engine 2	07/10/2014
P003	Compressor engine 3	07/10/2014
P009	Dehydration system	07/10/2014
P013	Pigging operations	07/10/2014

74. PTIO P0116267 that was issued on May 27, 2014, requires the emissions from EUs P001, P002, and P003 not to exceed 0.32 g/hp-hr for VOC.

75. On September 29, 2015, Respondent conducted an emissions test for EU P001 and the emissions rate was 0.50 g/hp-hr for VOC, in violation of the terms and conditions of the PTIO and ORC § 3704.05(C). Respondent conducted and passed a re-test on November 10, 2015.

76. On September 29, 2015, Respondent conducted an emissions test for EU P002 and the emissions rate was 0.69 g/hp-hr for VOC, in violation of the terms and conditions of the PTIO and ORC § 3704.05(C). Respondent conducted a re-test on November 10, 2015 and failed again for VOC (0.38 g/hp-hr). Respondent conducted and passed a re-test on November 8, 2016.

77. On November 11, 2015, Respondent conducted an emissions test for EU P003 and the emissions rate was 0.55 g/hp-hr for VOC, in violation of the terms and conditions of the PTIO and ORC § 3704.05(C). Respondent conducted and passed a re-test on November 8, 2016.

78. PTIO P0116267 requires the fugitive VOC emissions from EU P013 not to exceed 0.07 ton per month as a rolling, 12- month average.

79. In violation of the terms and conditions of the PTIO and ORC § 3704.05(C), Respondent has been exceeding the VOC emissions for EU P013 since August 2016. The highest monthly average through April 2017 was 0.22 ton per month. On November 18, 2017, Respondent requested an administrative modification to the PTIO to increase the fugitive VOC emissions to 0.29 ton per month.

80. On April 20, 2017, SEDO conducted an inspection of Facility #11 and observed a second dehydration unit in operation that had not been permitted, in violation of OAC Rule 3745-31-02(A) and ORC § 3704.05(G). On November 18, 2017, Respondent requested an administrative modification to the PTIO to address the second dehydration unit.

81. SEDO sent NOV letters to Respondent for the stack emissions violations at Facility #11 on December 8, 2015 and January 12, 2016, and for the remaining violations on September 14, 2017.

Facility #12: Flushing A Dehydration Facility (0607075007)

82. The following emissions units at Facility #12 are the subject of these Orders and are subject to Ohio EPA rules and regulations.

EUs ID	Description	Date Installed
F001	Equipment and pipeline leaks	10/21/2015
P001	Dehydration system	10/21/2015

83. PTIO P0119630 that was issued on October 20, 2015, requires Respondent to provide the following information concerning EU P001 as part of the annual PER:

- The annual facility natural gas or hydrocarbon liquid throughput during the year of the report;
- Identification of the kind of liquid glycol used in the dehydrator during the year of the report (ethylene glycol, diethylene glycol, or triethylene glycol); and
- Additional information as identified in the PTIO only if using triethylene glycol.

84. Respondent failed to provide Ohio EPA with the required information for EU P001 as part of the PER for the years 2015 and 2016, in violation of the terms and conditions of the PTIO and ORC § 3704.05(C). Respondent submitted revised 2015 and 2016 PERs to Ohio EPA on November 18, 2017.

85. PTIO P0119630 requires Respondent to develop and implement a leak detection and repair plan program for EU F001 that meets several requirements. One of the requirements is to complete the initial monitoring within 90 days of startup and quarterly thereafter for the first year.

86. Respondent failed to complete the initial monitoring for EU F001 by January 18, 2016, in violation of the terms and conditions of the PTIO and ORC § 3704.05(C). The initial monitoring for EU F001 was completed on June 9, 2016 (153 days late).

87. PTIO P0119630 requires Respondent to develop and implement a site-specific WPP designed to minimize or eliminate fugitive dust from EU F002 and submit the plan to Ohio EPA within 30 days of the issuance of the permit.

88. In violation of the terms and conditions of the PTIO and ORC § 3704.05(C), Respondent failed to submit the WPP for EU F002 by November 19, 2015. The WPP was received by SEDO on November 17, 2017.

89. SEDO sent a NOV letter to Respondent for the violations at Facility #12 on September 14, 2017.

Facility #13: Belmont Field Station #1 (0607015022)

90. The following emissions units at Facility #13 are the subject of these Orders and are subject to Ohio EPA rules and regulations.

EUs ID	Description	Date Installed
F001	Equipment and pipeline leaks	04/20/2015
P001	Dehydration system	04/20/2015

91. PTIO P0118635 that was issued on April 28, 2015, requires Respondent to provide the following information concerning EU P001 as part of the annual PER:

- The annual facility natural gas or hydrocarbon liquid throughput during the year of the report;
- Identification of the kind of liquid glycol used in the dehydrator during the year of the report (ethylene glycol, diethylene glycol, or triethylene glycol); and
- Additional information as identified in the PTIO only if using triethylene glycol.

92. On April 20, 2017, SEDO conducted a compliance inspection of facility #13 and discovered that Respondent failed to provide Ohio EPA with the required information for EU P001 as part of the 2015 and 2016 PERs, in violation of the terms and conditions of the PTIO and ORC § 3704.05(C). Respondent submitted revised 2015 and 2016 PERs on November 18, 2017.

93. PTIO P0118635 requires Respondent to develop and implement a leak detection and repair plan program for EU F001 that meets several requirements. One of the requirements is to complete the initial monitoring within 90 days of startup and quarterly thereafter for the first year.

94. As a result of an Ohio EPA compliance inspection on April 20, 2017, it was discovered that Respondent failed to complete the initial monitoring for EU F001 by June 27, 2015, in violation of the terms and conditions of the PTIO and ORC § 3704.05(C). The initial monitoring for EU F001 was completed on June 6, 2016 (310 days late).

94. PTIO P0118635 requires Respondent to develop and implement a site-specific WPP designed to minimize or eliminate fugitive dust from EU F002 and submit the plan to Ohio EPA within 30 days of the issuance of the permit.

95. In violation of the terms and conditions of the PTIO and ORC § 3704.05(C), Respondent failed to submit the WPP for EU F002 by May 27, 2015. The WPP was received by SEDO on November 17, 2017.

96. SEDO sent a NOV letter to Respondent for the violations at Facility #13 on September 14, 2017.

97. The Director has given consideration to, and based his determination on, evidence relating to the technical feasibility and economic reasonableness of complying with the following Orders and their relation to benefits to the people of the State to be derived from such compliance.

V. ORDER

The Director hereby issues the following Order:

1. Respondent shall pay the amount of seventy-eight thousand dollars (\$78,000) in settlement of Ohio EPA's claims for civil penalties, which may be assessed pursuant to ORC Chapter 3704. Within thirty (30) days after the effective date of these Orders, payment to Ohio EPA shall be made by an official check made payable to "Treasurer, State of Ohio" for seventy-eight thousand dollars (\$78,000). The official check shall be submitted to Carol Butler, or her successor, together with a letter identifying the Respondent, to:

Ohio EPA
Office of Fiscal Administration
P.O. Box 1049
Columbus, Ohio 43216-1049

VI. TERMINATION

Respondent's obligations under these Orders shall terminate when Respondent certifies in writing and demonstrates to the satisfaction of Ohio EPA that Respondent has performed all obligations under these Orders, these obligations have been embedded in operation permits, and the Chief of Ohio EPA's Division of Air Pollution Control acknowledges, in writing, the termination of these Orders. If Ohio EPA does not agree that all obligations have been performed, then Ohio EPA will notify Respondent of the obligations that have not been performed, in which case Respondent shall have an opportunity to address any such deficiencies and seek termination as described above.

The certification shall contain the following attestation: "I certify that the information contained in or accompanying this certification is true, accurate and complete."

This certification shall be submitted by Respondent to Ohio EPA and shall be signed by a responsible official of Respondent. For purposes of these Orders, a responsible official is as defined in OAC Rule 3745-33-03(F)(1) for a corporation, or a corporate officer who is in charge of a principal business function of Respondent.

VII. OTHER CLAIMS

Nothing in these Orders shall constitute or be construed as a release from any claim, cause of action or demand in law or equity against any person, firm, partnership or corporation, not a party to these Orders, for any liability arising from, or related to, operations by Respondent.

VIII. OTHER APPLICABLE LAWS

All actions required to be taken pursuant to these Orders shall be undertaken in accordance with the requirements of all applicable local, state and federal laws and regulations. These Orders do not waive or compromise the applicability and enforcement of any other statutes or regulations applicable to Respondent.

IX. MODIFICATIONS

These Orders may be modified by agreement of the parties hereto. Modifications shall be in writing and shall be effective on the date entered in the journal of the Director of Ohio EPA.

X. NOTICE

All documents required to be submitted by Respondent pursuant to these Orders shall be addressed to:

Ohio EPA
Southeast District Office
2195 Front Street
Logan, Ohio 43138
Attention: Melisa Witherspoon

and to:

Ohio EPA
Division of Air Pollution Control
P.O. Box 1049
Columbus, Ohio 43216-1049
Attention: Jim Kavalec, Manager
Compliance and Enforcement Section

or to such persons and addresses as may hereafter be otherwise specified in writing by Ohio EPA.

XI. RESERVATION OF RIGHTS

Ohio EPA and Respondent each reserve all rights, privileges and causes of action, except as specifically waived in Section XII of these Orders.

XII. WAIVER

In order to resolve disputed claims, without admission of fact, violation or liability, and in lieu of further enforcement action by Ohio EPA for only the violations specifically cited in these Orders, Respondent consents to the issuance of these Orders and agrees to comply with these Orders. Compliance with these Orders shall be a full accord and satisfaction for Respondent's liability for the violations specifically cited herein.

Respondent hereby waives the right to appeal the issuance, terms and conditions, and service of these Orders and Respondent hereby waives any and all rights Respondent may have to seek administrative or judicial review of these Orders either in law or equity.

Notwithstanding the preceding, Ohio EPA and Respondent agree that if these Orders are appealed by any other party to the Environmental Review Appeals Commission, or any court, Respondent retains the right to intervene and participate in such appeal. In such an event, Respondent shall continue to comply with these Orders notwithstanding such appeal and intervention unless these Orders are stayed, vacated or modified.

XIII. EFFECTIVE DATE

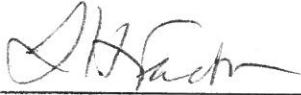
The effective date of these Orders is the date these Orders are entered into the Ohio EPA Director's journal.

XIV. SIGNATORY AUTHORITY

Each undersigned representative of a party to these Orders certifies that he or she is fully authorized to enter into these Orders and to legally bind such party to these Orders.

ORDERED AND AGREED:

Ohio Environmental Protection Agency



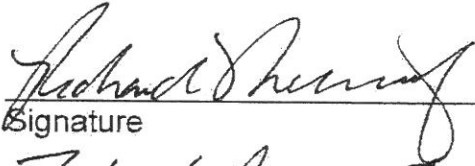
Craig W. Butler
Director

4/20/18

Date

AGREED:

Blue Racer Midstream, LLC



Signature

4/11/18

Date

Richard Moncrief

Printed or Typed Name

President + COO

Title