

**OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

MEMORANDUM

September 16, 2026

TO: Lee Warden, P.E., Permits and Engineering Group Manager

THROUGH: Rick Groshong, Environmental Manager, Compliance and Enforcement

THROUGH: Phillip Martin, P.E., Engineering Manager, Existing Source Permits Section

THROUGH: Caleb Jobe, E.I., New Source Permits Section

FROM: Calin Hoots, E.I., New Source Permits Section

SUBJECT: Evaluation of Permit by Rule Application No. **2024-1223-O**
Registration to Construct and Operate under the Permit by Rule for Oil
and Natural Gas Sector (PBR-O&NG)
Blake Production Co. Inc.
Cypress 1816 1-35H (SIC 1311/NAICS 211130)
Facility ID No: 10359
Latitude: 35.98638°N, Longitude: 98.88132°W
Section 31, Township 18N, Range 16W, Dewey County, Oklahoma
Directions: From the intersection of Primrose Ave and Highway 183 in
Taloga, Oklahoma, drive south for 2.5 miles. Turn left onto E0700 Rd and
drive for 1.0 miles. Turn right and follow the road for 2.6 miles. Turn right
onto N2290 Rd and drive 0.2 miles. Turn left and follow the road onto
E0710 Rd for 2.3 miles. The facility is on the left.

SECTION I. INTRODUCTION

Blake Production Co. Inc. (Blake or the applicant) has submitted a Registration to Construct and Operate under the PBR-O&NG for their Cypress 1816 1-35H. The facility is currently not operating under any other authorization. The facility began operation on June 16, 2022.

The facility previously operated as a major source and was required to submit a Title V application along with the application to construct and operate under the PBR.

The facility has demonstrated it is eligible for coverage based on the criteria listed in OAC 252:100-7-60.5(a). This is a “true minor” facility, since all authorizations under the PBR-O&NG are covered as “true minor” facilities.

SECTION II. PROCESS DESCRIPTION

The facility is made up of one well, Cypress 1816 1-35H, and is located at the wellhead.

The well streams will enter the facility through a separator, where condensate and water are removed and sent to the heater treater. Gas from the separator and the heater treater is routed to the sales line. The remaining liquids from the heater treater are stored in the condensate and produced water tanks as appropriate. The storage tanks are controlled by an enclosed combustor and unloaded by truck.

SECTION III. EQUIPMENT

The following is a list of current equipment.

ID#	Equipment Type	Size / Rating	Control Type	Manufacture Date
ENG-1	Caterpillar G3306	145-hp	NSCR	08/07/2013
T-1	Condensate Tank	400-bbl	Flare	Before 12/6/2022
T-2	Condensate Tank	400-bbl	Flare	Before 12/6/2022
T-3	Condensate Tank	400-bbl	Flare	Before 12/6/2022
T-4	Condensate Tank	400-bbl	Flare	Before 12/6/2022
PW-1	Produced Water Tank	400-bbl	Flare	Before 12/6/2022
PW-2	Produced Water Tank	400-bbl	Flare	Before 12/6/2022
LOAD-1	Condensate Loading	-	-	-
LOAD-2	Prod. Water Truck Loading	-	-	-
H-1	Heater Treater	0.5-MMBTUH	-	Before 12/6/2022
F-1	Flare	0.81-MMBTUH	-	Before 12/6/2022
FUG-1	Fugitives	-	-	-
MSS-BD	Blowdown Maintenance Emissions	-	-	-

SECTION IV. FACILITY-SPECIFIC OR REPRESENTATIVE SAMPLE

TANKS

The facility has provided a facility-specific sample that is less than three years old for each piece of equipment whose emissions are based on a sample.

FUGITIVES

The facility did not submit a gas or liquid sample and assumed 100% VOC content for the gas and liquid service components.

SECTION V. EMISSIONS

Unless otherwise stated potential emissions are based on 8,760 hours per year of operation with combustion sources firing field-grade natural gas with a maximum sulfur content of 162 ppmv.

ENGINES

NO_x, CO, and VOC emissions from the engine are based on manufacturer's data as shown in the table below. H₂CO emissions are based on AP-42, Table 3.2-3, Stationary Internal Combustion Sources 3.2-15. The engine is equipped with an NSCR, with control efficiencies of 92.6% for NO_x and 85.1% for CO. The VOC emissions do not include H₂CO which will be added to the VOC emissions in the facility-wide totals.

Engine Emission factors

Point	NO _x	CO	VOC	H ₂ CO
	g/hp-hr	g/hp-hr	g/hp-hr	g/hp-hr
COMP1 ⁽¹⁾	1.0	2.0	0.7	0.105

⁽¹⁾ Fuel consumption is 7,543-Btu/hp-hr.

Engine Emissions

Point	NO _x		CO		VOC		H ₂ CO	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
COMP1	3.04	1.40 ⁽¹⁾	0.64	2.80 ⁽²⁾	0.23	0.98	0.25	0.10

⁽¹⁾ Includes a 92.6% reduction from the OC.

⁽²⁾ Includes a 85.1% reduction from the OC.

HEATER

Emissions are based on AP-42 (7/98), Section 1.4, a gas heating value of 1,020 BTU/SCF, and the rating shown in the second table.

Heater Emission Factors

ID#	NO _x	CO	VOC
	lb/MMSCF	lb/MMSCF	lb/MMSCF
H-1	100	84	5.5

Heater Emissions

ID#	Rating	NO _x		CO		VOC	
	MMBTUH	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
H-1	0.5	0.05	0.21	0.04	0.18	<0.01	0.01

TANKS

Working and breathing emissions from the condensate and produced water tanks were calculated using AP-42 (11/19), Section 7.1 equations. Flashing emissions were calculated using a facility specific liquid analysis, flash factor obtained from the sample, and the listed annualized throughput. Flash emissions at the condensate and produced water tanks result as liquids under pressure enter the tanks at atmospheric pressure. Flashing emissions from the produced water tanks were calculated assuming 1% of the condensate properties. Actual emissions from the storage

tanks are routed to the enclosed flare (F-1) for control with a 98% capture efficiency and a 98% control efficiency.

Tank Emissions (per tank)

Parameter	T- 1 – T-4 Data	PW-1 – PW-2 Data
Throughput, gal/yr	344,925	122,640
Liquid in Tank(s)	Condensate/Oil	Produced Water
Working/Breathing Method/Tool	AP-42 (11/19)	AP-42 (11/19)
Flash Calculation Method/Tool	Flash Factor from Representative Sample	Flash Factor from Representative Sample
Working/Breathing Emissions, TPY	2.87	1.76
Flashing Emissions, TPY	7.00	0.02
Control Type	Flare	Flare
Total Potential VOC Emissions, TPY	9.87	1.78
Actual Capture Efficiency, %	98	98
Actual Control Efficiency, %	98	98
Tank VOC Emitted at Tank, TPY	0.20	0.04
Tank VOC Emitted at Flare, TPY	0.19	0.03
Total Actual VOC Emissions, TPY	0.39	0.07

LOADING

Emissions from loading condensate into tank trucks were estimated using AP-42 (6/08), Section 5.2, Equation 1, and the parameters listed in the table below. The vapor pressure, molecular weight, and temperature listed are from AP-42 (11/19), Section 7.1 defaults for Oklahoma City, Oklahoma and Motor Gasoline (RVP 9).

HAP emissions from loading are calculated based on the working/breathing emissions stream composition from ProMax.

Loading Parameters and Emissions

Parameter	LOAD-1	LOAD-2
Liquids Loaded	Condensate/Oil	Produced Water
Throughput, gal/yr	1,379,700	245,280
Saturation Factor	0.6	0.6
Temp., °F	67.51	67.51
TVP, psia	6.695	6.695
MW, lb/lbmol	65.0	65.0
VOC, wt. %	100	1
Emission Factor, lb/10 ³ gal ⁽¹⁾	6.167	6.167
Potential/Actual VOC Emissions, TPY	4.25	<0.01

⁽¹⁾ Final factor considering any VOC reduction stated for methane/ethane.

FLARE

Potential emissions of NO_x and CO are based on emission factors from AP-42 (2/18), Section 13.5. VOC emissions for the tank flare (F-1) are based on the emissions from the storage tanks with a 98% destruction efficiency.

Flare Combustion Potential/Actual Emissions

ID#	Total Gas Combusted MMBTUH	Emission Factor lb/MMBTU		NO _x TPY	CO TPY
		NO _x	CO		
F-1	0.81	0.068	0.310	0.27	1.13

Flare Actual VOC Emissions

ID#	Process Point(s)	VOC Emissions, TPY
F-1	Storage Tanks	0.82
F-1	Pilot	0.03

FUGITIVES

Emissions from fugitive equipment leaks (FUG-1) are based on EPA's "Protocol for Equipment Leak Emission Estimates" (11/95, EPA-453/R-95-017), an estimated number of components, and the VOC (C₃₊) and HAP content of the materials handled.

Fugitive Emissions

ID#	VOC, TPY
FUG-1	2.14

MAINTENANCE, STARTUPS, AND SHUTDOWN

Maintenance, startup, and shutdown (MSS) events consist of blowdown emissions from various processes, pipeline pigging and purging activities, and maintenance activities from various processes. Emissions are based on an estimated number of events, an estimated volume of vapors released, and an estimated VOC content of the vapors from each type of activity.

Maintenance, Startup, and Shutdown Emissions

ID#	VOC, TPY
MSS	1.90

FACILITY-WIDE EMISSIONS**Facility-Wide Potential Emissions**

ID#	Description	NO _x	CO	VOC	HAPs
		TPY	TPY	TPY	TPY
ENG-1	145-hp Caterpillar G3306 ⁽¹⁾	1.40	2.80	1.08	0.10
T-1	400-bbl Condensate Tank	-	-	9.87	0.01
T-2	400-bbl Condensate Tank	-	-	9.87	0.01
T-3	400-bbl Condensate Tank	-	-	9.87	0.01
T-4	400-bbl Condensate Tank	-	-	9.87	0.01

ID#	Description	NO _x	CO	VOC	HAPs
		TPY	TPY	TPY	TPY
PW-1	400-bbl Produced Water Tank	-	-	1.78	<0.01
PW-2	400-bbl Produced Water Tank	-	-	1.78	<0.01
LOAD-1	Condensate Loading	-	-	4.25	0.15
LOAD-2	Prod. Water Loading	-	-	<0.01	<0.01
H-1	0.5-MMBTUH Heater Treater	0.21	0.18	0.01	<0.01
F-1	0.81-MMBTUH Flare ⁽²⁾	0.27	1.13	0.03	<0.01
MSS-BD	Blowdown Maintenance Emissions	-	-	1.90	0.08
Total Potential Emissions (Excluding Fugitive Emissions)		1.88	4.11	50.32	0.42

⁽¹⁾ Includes Formaldehyde in VOC emissions.

⁽²⁾ Potential VOC emissions from the flare includes only pilot emissions.

Facility-Wide Actual Emissions

ID#	Description	NO _x	CO	VOC	HAPs
		TPY	TPY	TPY	TPY
ENG-1	145-hp Caterpillar G3306 ⁽¹⁾	1.40	2.80	1.08	0.10
T-1	400-bbl Condensate Tank	-	-	0.20	0.01
T-2	400-bbl Condensate Tank	-	-	0.20	0.01
T-3	400-bbl Condensate Tank	-	-	0.20	0.01
T-4	400-bbl Condensate Tank	-	-	0.20	0.01
PW-1	400-bbl Produced Water Tank	-	-	0.04	<0.01
PW-2	400-bbl Produced Water Tank	-	-	0.04	<0.01
LOAD-1	Condensate Loading	-	-	4.25	0.15
LOAD-2	Prod. Water Loading	-	-	<0.01	<0.01
H-1	0.5-MMBTUH Heater Treater	0.21	0.18	0.01	<0.01
F-1	0.81-MMBTUH Flare ⁽²⁾	0.27	1.13	0.85	<0.01
FUG-1	Fugitives	-	-	2.14	0.09
MSS-BD	Blowdown Maintenance Emissions	-	-	1.90	0.08
Total Actual Emissions		1.88	4.11	11.12	0.51

⁽¹⁾ Includes Formaldehyde in VOC emissions.

⁽²⁾ Includes uncombusted VOC emissions from the tanks.

Since potential emissions of all criteria pollutants are less than 100 TPY, actual emissions of all criteria pollutants are less than 40 TPY, potential emissions of any single HAP are less than 10 TPY, and potential emissions of total HAP are less than 25 TPY, the facility is not a major source and is eligible for coverage under the PBR-O&NG.

SECTION VI. OKLAHOMA AIR POLLUTION CONTROL RULES REVIEW

OAC 252:100-1 (General Provisions)

[Applicable]

Subchapter 1 includes definitions but there are no regulatory requirements.

OAC 252:100-2 (Incorporation by Reference)

[Applicable]

This subchapter incorporates by reference applicable provisions of Title 40 of the Code of Federal Regulations. These requirements are addressed in the “Federal Regulations” section.

OAC 252:100-3 (Air Quality Standards and Increments) [Applicable]
Primary Standards are in Appendix E and Secondary Standards are in Appendix F of the Air Pollution Control Rules. At this time, all of Oklahoma is in attainment of these standards.

OAC 252:100-5 (Registration, Emissions Inventory and Annual Fees) [Applicable]
The owner or operator of any facility that is a source of air emissions shall submit a complete emission inventory annually on forms obtained from the Air Quality Division. Required annual information (Turn-Around Document) shall be provided to Air Quality.

OAC 252:100-7 (Permits for Minor Facilities) [Applicable]
Subchapter 7 sets forth the permit application fees and the basic substantive requirements of permits for minor facilities. This project meets the conditions for a minor facility operating permit because there is no emission of any regulated pollutant of 100 TPY or more and HAP emissions do not exceed the 10/25 TPY threshold. As such, major source BACT consideration and public review are not required.

OAC 252:100-9 (Excess Emission Reporting Requirements) [Applicable]
Except as provided in OAC 252:100-9-7(a)(1), the owner or operator of a source of excess emissions shall notify the Director as soon as possible but no later than 4:30 p.m. the following working day of the first occurrence of excess emissions in each excess emission event. No later than thirty (30) calendar days after the start of any excess emission event, the owner or operator of an air contaminant source from which excess emissions have occurred shall submit a report for each excess emission event describing the extent of the event and the actions taken by the owner or operator of the facility in response to this event. Request for mitigation, as described in OAC 252:100-9-8, shall be included in the excess emission event report. Additional reporting may be required in the case of ongoing emission events and in the case of excess emissions reporting required by 40 CFR Parts 60, 61, and 63.

OAC 252:100-13 (Open Burning) [Applicable]
Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in this subchapter.

OAC 252:100-19 (Particulate Matter) [Applicable]
Section 19-4 regulates emissions of PM from new and existing fuel-burning equipment, with emission limits based on maximum design heat input rating. Fuel-burning equipment is defined in OAC 252:100-19 as any internal combustion engine or gas turbine, or other combustion device used to convert the combustion of fuel into usable energy. Thus, the heater treater is subject to the requirements of this subchapter. OAC 252:100, Appendix C specifies a PM emission limitation of 0.60 lb/MMBTU for all equipment at this facility with a heat input rating of 10 MMBTUH or less. Table 1.4-2 of AP-42 (7/98) lists the total PM emissions for natural gas-fired heaters to be 7.6 lb/MMft³ or about 0.0075 lb/MMBTU. The applicant has indicated the facility uses natural gas for all fuel-burning equipment to ensure compliance with Subchapter 19.

ID#	Equipment	Maximum Heat Input (MMBTUH)	Emissions (lb/MMBTU)	
			Appendix C	Potential
H-1	Heater Treater	0.5	0.60	<0.01
ENG-1	145-hp Caterpillar G3306 Engine	1.09	0.60	<0.01

Section 19-12 limits emissions of particulate matter from industrial processes and direct-fired fuel-burning equipment based on their process weight rates. Since there are no significant particulate emissions from the nonfuel-burning processes at the facility compliance with the standard is assured without any special monitoring provisions.

OAC 252:100-25 (Visible Emissions and Particulates)

[Applicable]

No discharge of greater than 20% opacity is allowed except for short-term occurrences that consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity. When burning natural gas there is little possibility of exceeding the opacity standards.

OAC 252:100-29 (Fugitive Dust)

[Applicable]

No person shall cause or permit the discharge of any visible fugitive dust emissions beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. Under normal operating conditions, this facility will not cause a problem in this area, therefore it is not necessary to require specific precautions to be taken.

OAC 252:100-31 (Sulfur Compounds)

[Applicable]

Part 2 limits the ambient air concentration of H₂S emissions from any facility to 0.2 ppmv (24-hour average) at standard conditions which is equivalent to 283 µg/m³. Based on modeling conducted for the general permit for oil and gas facilities, the ambient impacts of H₂S from oil and gas facilities combusting natural gas with a maximum H₂S content of 162 ppmv and storing condensate or sweet crude oil will be in compliance with the H₂S ambient air concentration limit. Part 5 limits sulfur dioxide emissions from new petroleum or natural gas process equipment (constructed after July 1, 1972). For gaseous fuels the limit is 0.2 lb/MMBTU heat input averaged over 3 hours. For fuel gas having a gross calorific value of 1,000 BTU/SCF, this limit corresponds to fuel sulfur content of 1,203 ppmv. Gas produced from oil and gas wells having 162 ppmv or less total sulfur will ensure compliance with Subchapter 31. The applicant has indicated the facility uses pipeline-grade natural gas or field gas with a maximum sulfur content of 162 ppmv for all fuel-burning equipment to ensure compliance with Subchapter 31.

Part 5 also limits hydrogen sulfide emissions from new petroleum or natural gas process equipment (constructed after July 1, 1972). H₂S contained in the waste gas stream from any petroleum or natural gas process equipment shall be reduced by 95% by removal or by being oxidized to SO₂ prior to being emitted to the ambient air. This requirement shall not apply if a facility's emissions of H₂S do not exceed 0.3 lb/hr, two-hour average. Direct oxidation of hydrogen sulfide is allowed for units whose emissions would be less than 100 lb/hr of sulfur dioxide for a two-hour average. There is no applicable process equipment located at the facility.

OAC 252:100-33 (Nitrogen Oxides)

[Not Applicable]

This subchapter limits NO_x emissions from new fuel-burning equipment with rated heat input greater than or equal to 50 MMBTUH to emissions of 0.2 lb of NO_x per MMBTU. There are no equipment items that exceed the 50 MMBTUH threshold.

OAC 252:100-35 (Carbon Monoxide)

[Not Applicable]

None of the following affected processes are located at this facility: gray iron cupola, blast furnace, basic oxygen furnace, petroleum catalytic cracking unit, or petroleum catalytic reforming unit.

OAC 252:100-37 (Volatile Organic Compounds)

[Part 7 is Applicable]

Part 3 requires storage tanks constructed after December 28, 1974, with a capacity of 400 gallons or more and storing a VOC with a vapor pressure greater than 1.5 psia at maximum storage temperature to be equipped with a permanent submerged fill pipe or with an organic vapor recovery system. The storage tanks are considered prior to custody transfer and are therefore not subject to this rule.

Part 3 requires loading facilities with a throughput equal to or less than 40,000 gallons per day to be equipped with a system for submerged filling of tank trucks or trailers if the capacity of the vehicle is greater than 200 gallons. This facility does not have the physical equipment (loading arm and pump) to conduct this type of loading. Therefore, this requirement is not applicable.

Part 5 limits the VOC content of coatings used in coating lines or operations. Any painting operation will involve maintenance coating of buildings and equipment and emit less than 100 lb/day of VOCs and is exempt.

Part 7 requires fuel-burning and refuse-burning equipment to be operated to minimize emissions of VOC. The equipment at this location is subject to this requirement.

Part 7 requires all effluent water separator openings which receive water containing more than 200 gallons per day of any VOC, to be sealed or the separator to be equipped with an external floating roof or a fixed roof with an internal floating roof or a vapor recovery system. No effluent water separators are located at this facility.

OAC 252:100-39 (VOC in Non-attainment and Former Non-attainment Areas) [Not Applicable]

This subchapter imposes additional conditions beyond those of Subchapter 37 on emissions of organic materials from new and existing facilities in Tulsa and Oklahoma Counties. This facility is located in Dewey County and therefore is not subject to this subchapter.

OAC 252:100-42 (Toxic Air Contaminants (TAC))

[Applicable]

This subchapter regulates TAC that are emitted into the ambient air in areas of concern (AOC). Any work practice, material substitution, or control equipment required by the Department prior to June 11, 2004, to control a TAC, shall be retained, unless a modification is approved by the Director. Since no AOC has been designated there are no specific requirements for this facility at this time.

OAC 252:100-43 (Testing, Monitoring, and Recordkeeping)

[Applicable]

This subchapter provides general requirements for testing, monitoring and recordkeeping and applies to any testing, monitoring or recordkeeping activity conducted at any stationary source. To determine compliance with emissions limitations or standards, the Air Quality Director may

require the owner or operator of any source in the state of Oklahoma to install, maintain and operate monitoring equipment or to conduct tests, including stack tests, of the air contaminant source. All required testing must be conducted by methods approved by the Air Quality Director and under the direction of qualified personnel. A notice-of-intent to test and a testing protocol shall be submitted to Air Quality at least 30 days prior to any EPA Reference Method stack tests. Emissions and other data required to demonstrate compliance with any federal or state emission limit or standard, or any requirement set forth in a valid permit shall be recorded, maintained, and submitted as required by this subchapter, an applicable rule, or permit requirement. Data from any required testing or monitoring not conducted in accordance with the provisions of this subchapter shall be considered invalid. Nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

SECTION VII. FEDERAL REGULATORY REVIEW

NSPS Subpart 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. This subpart regulates storage vessels with a capacity greater than or equal to 75 m³ (472 bbl) that are used to store volatile organic liquids.

This subpart does not apply to vessels with a design capacity less than or equal to 1,589.874 m³ (~10,000 bbl) used for petroleum or condensate stored, processed, or treated prior to custody transfer. The storage tanks are considered prior to custody transfer and are less than the applicable capacity limit; therefore, the storage tanks are not subject to this subpart.

NSPS Subpart LLL, Standards of Performance for SO₂ Emissions from Onshore Natural Gas Processing for which Construction, Reconstruction, or Modification Commenced after January 20, 1984, and on or before August 23, 2011. All equipment at the facility was either manufactured after August 23, 2011, or is otherwise not subject to the subpart. Therefore, this subpart does not apply.

NSPS Subpart IIII, Standards of Performance for Stationary Compression Ignition Combustion Engines. This subpart promulgates emission standards for all new CI engines ordered after July 11, 2005, and all CI engines modified or reconstructed after July 11, 2005. There are no CI engines at this facility. Therefore, this subpart does not apply.

NSPS Subpart JJJJ, Standards of Performance for Stationary SI Internal Combustion Engines (ICE). This subpart promulgates emission standards for all new SI engines ordered after June 12, 2006, and all SI engines modified or reconstructed after June 12, 2006, regardless of size. ENG-1 was constructed after June 12, 2006 and is therefore subject to this subpart.

NSPS Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification or Reconstruction Commenced After August 23, 2011, and on or Before September 18, 2015. The following table outlines the applicability of the subpart.

NSPS Subpart OOOO Applicability

§60.5365 section	Applicable? Y/N	Affected Facility	Comment
(a)	N	Gas well	After 9/18/15
(b)	N	Centrifugal compressor using wet seals	At a well site, not applicable
(c)	N	Reciprocating compressor	At a well site, not applicable
(d)		Pneumatic controller:	
	N	(1) between wellhead and point of custody transfer or an oil pipeline, bleed rate > 6 SCFH	Devices are low bleed
	N	(2) between wellhead and point of custody transfer to the natural gas transmission or storage segment, bleed rate > 6 SCFH	Devices are low bleed
	N	(3) located at natural gas processing plant, continuous bleed	Not at a gas plant
(e)	N	Storage vessel with the potential for VOC emissions $\geq$ 6 TPY	After 9/18/15
(f)	N	Group of all equipment in a process unit located at a gas plant	Not at a gas plant
(g)	N	Sweetening units located at gas processing plants	Not at a gas plant
(h)	N	Well completion following hydraulic refracturing	After 9/18/15

NSPS Subpart OOOOa, Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced After September 18, 2015, and on or Before December 6, 2022. The following table outlines the applicability of the subpart.

NSPS Subpart OOOOa Applicability

§60.5365a section	Applicable? Y/N	Affected Facility	Comment
(a)	Y	Well	6/16/2022; Subject
(b)	N	Centrifugal compressor using wet seals	At a well site, not applicable
(c)	N	Reciprocating compressor	At a well site, not applicable
(d)		Pneumatic controller:	
	N	(1) not located at a plant, bleed rate > 6 SCFH	Devices are low bleed
	N	(2) located at a gas plant, continuous bleed	Not a gas plant
(e)	Y	Storage vessel with the potential for VOC emissions $\geq$ 6 TPY	T-1, -2, -3, -4, and PW-1, -2
(f)	N	Group of all equipment in a process unit located at a gas plant	Not at a gas plant
(g)	N	Sweetening units located at gas processing plants	Not at a gas plant
(h)		Pneumatic pump:	
	N	(1) gas-driven diaphragm pump at a gas plant	Not at a gas plant
	N	(2) gas-driven diaphragm pump at a well site	None present
(i)	Y	Fugitive emissions components at a well site	Subject
(j)	N	Fugitive emissions components at a compressor station	Not at a compressor station

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 following table outlines the applicability of the subpart.

NSPS Subpart OOOOb Applicability

§60.5365b section	Applicable? Y/N	Affected Facility	Comment
(a)	N	Well	Before 12/6/2022
(b)	N	Centrifugal compressor using wet seals	Not applicable
(c)	N	Reciprocating compressor	Not applicable
(d)		Pneumatic controller:	
	N	(1) not located at a plant, bleed rate > 6 SCFH	Devices are low bleed
	N	(2) located at a gas plant, continuous bleed	Not a gas plant
(e)	N	Tank Battery with the potential for VOC emissions ≥ 6 TPY and/or methane emissions ≥ 20 TPY	
(f)	N	Group of all equipment in a process unit located at a gas plant	Not at a gas plant
(g)	N	Sweetening units located at gas processing plants	Not at a gas plant
(h)		Pneumatic pump:	
	N	(1) gas-driven diaphragm pump at a gas plant	Not at a gas plant
	N	(2) gas-driven diaphragm pump at a well site	None present
(i)	N	Fugitive emissions components at a well site	
(j)	N	Fugitive emissions components at a compressor station	Not a compressor station

At the time of permit issuance, NSPS Subpart OOOOb is currently under review by EPA. If federal legislation, rulemaking, or a court ruling invalidates all, or part of, OOOOb, the invalidated portions will no longer be applicable through this permit. In the interim, DEQ will exercise enforcement discretion as appropriate.

NESHAP Subpart HH, National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities. This subpart applies to affected emission points that are located at facilities which are major or area sources of HAPs and either process, upgrade, or store hydrocarbons prior to the point of custody transfer or prior to which the natural gas enters the natural gas transmission and storage source category. There are no TEG dehydration units at this facility. Therefore, this subpart is not applicable.

NESHAP Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary RICE. This subpart affects any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions.

ENG-1 was manufactured after June 12, 2006, and shall comply with this subpart by demonstrating compliance with NSPS Subpart JJJJ.

SECTION VIII. ADMINISTRATIVE**PREVIOUS PERMITS**

On issuance of this Registration to Construct and Operate (Registration No. 2024-1223-O), all previous authorizations and/or permits will be superseded and cancelled.

TIER CLASSIFICATION AND PUBLIC REVIEW

This application has been determined to be a **Tier II** based on the request for a PBR-O&NG Registration to Construct and Operate for an existing potential major source facility.

The applicant published the “DEQ Notice of Tier II Permit Application” in the *Dewey County Record*, a daily newspaper in Dewey County, Oklahoma on September 18, 2025. The notice stated that the application was available for review at the Anadarko Community Library and also at the Air Quality Division’s main office in Oklahoma City, Oklahoma.

The applicant will publish the “Notice of Tier II Draft Permit” as a legal notice in a newspaper of general circulation in the area where the source is located. A draft of this permit will be made available for public review for a period of 30 days as stated in the newspaper announcement and available at a local site within the county and on DEQ Web site. The draft permit will be available for a 30-day public review period.

The applicant has submitted an affidavit that they are not seeking a permit for land use or for any operation upon land owned by others without their knowledge. The affidavit certifies that the applicant has a current lease given to accomplish the permitted purpose.

FEE PAID

A fee of \$350 for a Registration to Construct and Operate has been paid. The facility previously operated as a major source and the additional fee of \$7,150 (\$7,500 total) to construct as a major source has been paid.

SECTION IX. COMPLIANCE

COMPLIANCE AND ENFORCEMENT CASES

On January 30, 2024, Blake submitted a voluntary self-disclosure for this facility which resulted in Enforcement Case No. 12659, which encompasses multiple facilities. The self-disclosure stated there was a violation related to the minor source permit requirements outlined in OAC 252:100-7. Specifically, the facility failed to obtain an operating permit and operated with potential to emit levels above major source thresholds. The permit will require Compliance and Enforcement review when processing. There are no further compliance issues associated with this facility that would prevent the issuance of this permit.

SECTION X. SUMMARY

The facility is operating as described in the application for a PBR-O&NG Registration to Construct and Operate. Ambient air quality standards are not threatened at the site. Issuance of the letter acknowledging the Registration to Construct and Operate is pending public review.

Blake Production Co. Inc.
Attn.: Kody Ewing
1601 NW Expressway, Suite 777
Oklahoma City, OK 73118

PBR Registration #: **2024-1223-O**
Facility ID #: 10359
Permit Writer: Calin Hoots
Date: September 16, 2026

SUBJECT: Cypress 1816 1-35H (SIC 1311/NAICS 211120)
Section 31, Township 18N, Range 16W, Dewey County, Oklahoma
Date Received: December 9, 2024

Dear Kody Ewing:

Air Quality has received your registration request to construct and operate under the Oil and Natural Gas Sector Permit by Rule (PBR) issued on September 10, 2013. It has been given the PBR registration number referenced above. Your request included the compliance certification required under OAC 252:100-7-60(b)(1). It is noted that the storage vessel designation(s) under OAC 252:100-7-60.5(c) were not requested for the equipment at this site.

At the time of permit issuance, NSPS Subpart OOOOb is currently under review by EPA. If federal legislation, rulemaking, or a court ruling invalidates all, or part of, OOOOb, the invalidated portions will no longer be applicable through this permit. In the interim, DEQ will exercise enforcement discretion as appropriate.

The fee assessed for this PBR registration is \$7,500 and \$7,500 has been received. Therefore, DEQ hereby acknowledges registration of your facility, and stipulates that construction/operation proceed in accordance with the referenced PBR. All previous Air Quality authorizations and/or permits have been superseded and cancelled. If this facility is sold, you must submit Air Quality Form 100-883 within 30 days following the change in ownership to transfer this permit to the new owner.

Also note that you are required to submit an emissions inventory for this facility. An emissions inventory must be completed through DEQ's electronic reporting system by April 1st of the following calendar year in which the facility is registered under the PBR. The reporting schedule thereafter is explained in OAC 252:100-5-2.1.(a)(2). Any questions concerning the reporting schedule or submittal process should be referred to the Emissions Inventory Staff at (405) 702-4100.

Thank you for your cooperation. If you have any questions, please refer to the PBR registration number above and contact the permit writer above at Calin.Hoots@deq.ok.gov, or (405) 702-4207.

Sincerely,

DRAFT

Kendal Stegmann
Division Director
AIR QUALITY DIVISION

Blake Production Co. Inc.
Attn.: Kody Ewing
1601 NW Expressway, Suite 777
Oklahoma City, OK 73118

PBR Registration #: **2024-1223-O**
Facility ID #: 10359
Permit Writer: Calin Hoots
Date: September 16, 2026

SUBJECT: Cypress 1816 1-35H (SIC 1311/NAICS 211120)
Section 31, Township 18N, Range 16W, Dewey County, Oklahoma
Date Received: December 9, 2024

Dear Kody Ewing:

Air Quality has received the permit application for the referenced facility and completed initial review. This application has been determined to be a Tier II application. In accordance with 27A O.S. 2-14-301 and 302 and OAC 252:4-7-13(c), the enclosed draft permit is now ready for public review. The requirements for public review of the draft permit include the following steps, which you must accomplish:

1. Publish at least one legal notice (one day) in at least one newspaper of general circulation within the county where the facility is located (Instructions enclosed);
2. Submit sample notice and provide date of publication to **AQD 5 days prior to notice publishing;**
3. Provide for public review, for a period of 30 days following the date of the newspaper announcement, a copy of the application and draft permit at a convenient location (preferentially at a public location) within the county of the facility;
4. Send AQD a signed affidavit of publication for the notice(s) from Item #1 above within 20 days of publication of the draft permit. Any additional comments or requested changes you have for the draft permit or the application should be submitted within 30 days of publication.

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact the permit writer at Calin.Hoots@deq.ok.gov or at (405) 702-4207.
Sincerely,



Lee Warden, P.E.
Chief Engineer
AIR QUALITY DIVISION

NOTICE OF DRAFT AUTHORIZATION OR REGISTRATION TIER II AIR QUALITY PERMIT APPLICATION

APPLICANT RESPONSIBILITIES

Permit applicants are required to give public notice that a Tier II draft permit has been prepared by DEQ. The notice must be published in one newspaper local to the site or facility. Note that if either the applicant or the public requests a public meeting, this must be arranged by the DEQ. The following steps are the applicant's responsibility:

1. Complete the public notice using the samples provided by AQD below;
2. Determine appropriate newspaper local to the facility for publishing;
3. Submit sample notice and provide date of publication to AQD 5 days prior to notice publishing; and
4. Upon publication, a signed affidavit of publication must be obtained from the newspaper and sent to AQD.

REQUIRED CONTENT (27A O.S. § 2-14-302 and OAC 252:4-7-13(c))

1. A statement that a Tier II draft authorization or registration has been prepared by DEQ;
2. Name and address of the applicant;
3. Name, address, driving directions, legal description and county of the site or facility;
4. The type of permit or permit action being sought;
5. A description of activities to be regulated, including an estimate of emissions from the facility;
6. Location(s) where the application and draft authorization may be reviewed (a location in the county where the site/facility is located must be included);
7. Name, address, and telephone number of the applicant and DEQ contacts;
8. Any additional information required by DEQ rules or deemed relevant by applicant;
9. A 30-day opportunity to request a formal public meeting on the draft authorization or registration acceptance.

**DEQ NOTICE OF TIER II DRAFT REGISTRATION TO OPERATE UNDER A
PERMIT BY RULE FOR A FACILITY CURRENTLY CLASSIFIED AS A TITLE
V FACILITY**

A Tier II application for a conversion of a Title V facility to a facility registered under a Permit by Rule has been filed with the Oklahoma Department of Environmental Quality (DEQ) by applicant, ...*name and address*.

The applicant requests approval to ...*brief description of purpose of application*... at the ...*site/facility name*[proposed to be] located at ...*physical address (if any), driving directions, and legal description including county*....

In response to the application, DEQ has prepared a draft review of the authorization request and an acknowledgment letter agreeing that the facility may register and operate under an existing Permit by Rule, ...*Permit by Rule name and regulation citation*...,

Registration Number: ...*xxxx-xxxx-x*..., which may be reviewed at ...*locations (one must be in the county where the site/facility is located)*... or at the Air Quality Division's main office (see address below). The draft registration review and acknowledgement letter are also available for review under Permits for Public Review on the DEQ Web Page:

<http://www.deq.ok.gov/>

This draft registration to operate would acknowledge the facility is allowed to emit the following regulated pollutants: (*list each pollutant and amounts in tons per year (TPY)*) [For facility modifications only, either add: , which represents (*identify the emissions change involved in the modification*)].

The public comment period ends 30 days after the date of publication of this notice. Any person may submit written comments concerning the draft registration to the Air Quality Division contact listed below or as directed through the corresponding online notice. A public meeting on the draft registration may also be requested in writing at the same address. Note that all public meetings are to be arranged and conducted by DEQ staff.

Information on all permit actions including draft permits, proposed permits, final issued permits and applicable review timelines are available in the Air Quality section of the DEQ Web page:

<https://oklahoma.gov/deq.html>.

For additional information, contact ...*names, addresses and telephone numbers of contact persons for the applicant*, or contact DEQ at: Chief Engineer, Air Quality Division, 707 N. Robinson, Suite 4100, P.O. Box 1677, Oklahoma City, OK, 73101-1677. Phone No. (405) 702-4100.

Department of Environmental Quality (DEQ)
Air Quality Division (AQD)
Acronym List
9-8-2025

ACFM	Actual Cubic Feet per Minute	GACT	Generally Achievable Control Technology
AD	Applicability Determination	GAL	Gallon (gal)
AFRC	Air-to-Fuel Ratio Controller	GDF	Gasoline Dispensing Facility
API	American Petroleum Institute	GEP	Good Engineering Practice
ASTM	American Society for Testing and Materials	GHG	Greenhouse Gases
AVO	Audio, Visual, or Olfactory	GR	Grain(s) (gr)
BACT	Best Available Control Technology	H₂CO	Formaldehyde
BAE	Baseline Actual Emissions	H₂S	Hydrogen Sulfide
BBL	Barrel(s)	HAP	Hazardous Air Pollutants
BHP	Brake Horsepower (bhp)	HC	Hydrocarbon
BTEX	Benzene, Toluene, Ethylbenzene, Xylene	HCFC	Hydrochlorofluorocarbon
BTU	British thermal unit (Btu)	HFR	Horizontal Fixed Roof
		HON	Hazardous Organic NESHAP
		HP	Horsepower (hp)
		HR	Hour (hr)
C&E	Compliance and Enforcement	I&M	Inspection and Maintenance
CAA	Clean Air Act	IBR	Incorporation by Reference
CAM	Compliance Assurance Monitoring	ICE	Internal Combustion Engine
CAS	Chemical Abstract Service		
CAAA	Clean Air Act Amendments	LAER	Lowest Achievable Emission Rate
CC	Catalytic Converter	LB	Pound(s) [Mass] (lb, lbs, lbm)
CCR	Continuous Catalyst Regeneration	LB/HR	Pound(s) per Hour (lb/hr)
CD	Consent Decree	LDAR	Leak Detection and Repair
CEM	Continuous Emission Monitor	LNG	Liquefied Natural Gas
CFC	Chlorofluorocarbon	LT	Long Ton(s) (metric)
CFR	Code of Federal Regulations	LTPD	Long Tons per Day
CI	Compression Ignition	LPE	Legally and Practicably Enforceable
CNG	Compressed Natural Gas		
CO	Carbon Monoxide or Consent Order	M	Thousand (Roman Numeral)
COA	Capable of Accommodating	MAAC	Maximum Acceptable Ambient Concentration
COM	Continuous Opacity Monitor	MACT	Maximum Achievable Control Technology
D	Day	MM	Prefix used for Million (Thousand-Thousand)
DEF	Diesel Exhaust Fluid	MMBTU	Million British Thermal Units (MMBtu)
DG	Demand Growth	MMBTUH	Million British Thermal Units per Hour (MMBtu/hr)
DSCF	Dry Standard (At Standard Conditions) Cubic Foot (Feet)	MMSCF	Million Standard Cubic Feet (MMscf)
		MMSCFD	Million Standard Cubic Feet per Day
EGU	Electric Generating Unit	MSDS	Material Safety Data Sheet
EI	Emissions Inventory	MWC	Municipal Waste Combustor
EPA	Environmental Protection Agency	MWe	Megawatt Electrical
ESP	Electrostatic Precipitator		
EUG	Emissions Unit Group	NA	Nonattainment
EUSGU	Electric Utility Steam Generating Unit	NAAQS	National Ambient Air Quality Standards
		NAICS	North American Industry Classification System
FCE	Full Compliance Evaluation	NESHAP	National Emission Standards for Hazardous Air Pollutants
FCCU	Fluid Catalytic Cracking Unit		
FEL	Federally Enforceable Limit(s)	NH₃	Ammonia
FESOP	Federally Enforceable State Operating Permit	NMHC	Non-methane Hydrocarbon
FIP	Federal Implementation Plan	NGL	Natural Gas Liquids
FR	Federal Register		

NO₂	Nitrogen Dioxide	SCR	Selective Catalytic Reduction
NO_x	Nitrogen Oxides	SEP	Supplemental Environmental Project
NOI	Notice of Intent	SER	Significant Emission Rate
NSCR	Non-Selective Catalytic Reduction	SI	Spark Ignition
NSPS	New Source Performance Standards	SIC	Standard Industrial Classification
NSR	New Source Review	SIP	State Implementation Plan
		SNCR	Selective Non-Catalytic Reduction
O₃	Ozone	SO₂	Sulfur Dioxide
O&G	Oil and Gas	SO_x	Sulfur Oxides
O&M	Operation and Maintenance	SOP	Standard Operating Procedure
O&NG	Oil and Natural Gas	SRU	Sulfur Recovery Unit
OAC	Oklahoma Administrative Code		
OC	Oxidation Catalyst	T	Tons
OGI	Optical Gas Imaging	TAC	Toxic Air Contaminant
		TEG	Triethylene Glycol
PAH	Polycyclic Aromatic Hydrocarbons	THC	Total Hydrocarbons
PAE	Projected Actual Emissions	TPY	Tons per Year
PAL	Plant-wide Applicability Limit	TRS	Total Reduced Sulfur
Pb	Lead	TSP	Total Suspended Particulates
PBR	Permit by Rule	TV	Title V of the Federal Clean Air Act
PCB	Polychlorinated Biphenyls		
PCE	Partial Compliance Evaluation	µg/m³	Micrograms per Cubic Meter
PEA	Portable Emissions Analyzer	US EPA	U. S. Environmental Protection Agency
PFAS	Per- and Polyfluoroalkyl Substance		
PM	Particulate Matter	VFR	Vertical Fixed Roof
PM_{2.5}	Particulate Matter with an Aerodynamic Diameter <= 2.5 Micrometers	VMT	Vehicle Miles Traveled
PM₁₀	Particulate Matter with an Aerodynamic Diameter <= 10 Micrometers	VOC	Volatile Organic Compound
POM	Particulate Organic Matter or Polycyclic Organic Matter	VOL	Volatile Organic Liquid
ppb	Parts per Billion	VRT	Vapor Recovery Tower
ppm	Parts per Million	VRU	Vapor Recovery Unit
ppmv	Parts per Million Volume		
ppmvd	Parts per Million Dry Volume	YR	Year
PSD	Prevention of Significant Deterioration	2SLB	2-Stroke Lean Burn
psi	Pounds per Square Inch	4SLB	4-Stroke Lean Burn
psia	Pounds per Square Inch Absolute	4SRB	4-Stroke Rich Burn
psig	Pounds per Square Inch Gage		
RACT	Reasonably Available Control Technology		
RATA	Relative Accuracy Test Audit		
RAP	Regulated Air Pollutant or Reclaimed Asphalt Pavement		
RFG	Refinery Fuel Gas		
RICE	Reciprocating Internal Combustion Engine		
RO	Responsible Official		
ROAT	Regional Office at Tulsa		
RVP	Reid Vapor Pressure		
SCC	Source Classification Code		
SCF	Standard Cubic Foot		
SCFD	Standard Cubic Feet per Day		
SCFM	Standard Cubic Feet per Minute		