

May 4, 2022

Sam Schupbach – VP Operations Processing, Nathan Wheldon - Sr. Manager – Air Programs, Allie Juarez – G&P Engineer 1,
& Philip Jereza – HES Professional

Via email to: Sam Schupbach (SSSchupbach@marathonpetroleum.com)
Nathan Wheldon (NMWheldon@marathonpetroleum.com),
Allie Juarez (AJuarez@marathonpetroleum.com), & Philip Jereza
(PJeraza@marathonpetroleum.com)

MarkWest Liberty Midstream & Resources, L.L.C.
4600 J Barry Court, Suite 500
Cannonsburg, PA 15317

Re: Notice of Termination of Construction Authorization
GP5-63-01011A and GP1-63-01011A
MarkWest Liberty Midstream & Resources, L.L.C.
Harmon Creek Gas Plant
Smith Township, Washington County

Dear Nathan Wheldon, Allie Juarez, and Philip Jereza,

On January 17, 2018 the Department authorized MarkWest Liberty Midstream & Resources, L.L.C.(MarkWest) to use GENERAL PLAN APPROVAL AND/OR GENERAL OPERATING PERMIT BAQ-GPA/GP-5 2000-PM-BAQ2025 1/2015 at its Harmon Creek Gas Plant (HCG Plant), located in Smith Township, Washington County (January 17, 2018 GP5). The January 17, 2018 GP-5 authorized MarkWest to construct and operate:

- Two (2) 200 MMscf/d Cryogenic Processing Plants
- One (1) De-Ethanization Fractionation Plant
- One (1) 8,134 MMBtu/hr plant flare
- Ten (10) 5,000 hp electric driven reciprocating compressors (rod packing emissions)
- Fugitive emissions from component leaks

On January 17, 2018, the Department authorized MarkWest to use GENERAL PLAN APPROVAL AND/OR GENERAL OPERATING PERMIT BAQ-GPA/GP-1 2700-PM-AQ0201 Rev. 7/2004(January 17, 2018 GP-1) at the HCG Plant. The January 17, 2018 GP-1 authorized MarkWest to construct and operate:

- Two (2) 10.25 MMBu/hr natural gas-fired Tulsa Heaters cryo mol sieve regen heaters
- Two (2) 41.22 MMBtu/hr natural gas-fired Scelerin Heaters de-ethanization HMO heaters
- One (1) 10.37 MMBtu/hr natural gas-fired Tulsa Heaters stabilization HMO heater

A letter from MarkWest, dated on April 17, 2020 and received by the Department on April 23, 2020, stated:

In accordance with air permit GP-5-63-01011A, Section A, 11, (c) (ii) this letter serves as notification of completion of construction. Additionally in accordance with Section A, 11, (c) (iii) of permit GP-5-63-01011A, this letter serves as notification for a lapse in construction for the MarkWest Liberty Midstream & Resources, L.L.C, Harmon Creek

Gas Plant located in Smith Township, Washington County Pennsylvania. At this time there is no anticipated time for the installation of some of the equipment listed in Permit Numbers GP1-63-01011A and GP5-63-01011A.

According to the letter the following equipment was not installed at the facility:

- Harmon Creek 2 - 200 MMscf/d Cryogenic Processing Plant
- One (1) Cryo Mol Sieve Regen Heater (H-2711) Covered in GP-1
- Six (6) 5,000 HP Electric Driver Reciprocating Compressors

Subsequent site inspections on September 16, 2021 and April 20, 2022, revealed that the following equipment has not been constructed and that all actual on-site construction activity at the facility occurred during the initial build out of the facility and well before April of 2020:

- Harmon Creek 2 - 200 MMscf/d Cryogenic Processing Plant
- One (1) Cryo Mol Sieve Regen Heater (H-2711) Covered in GP-1
- Three (3) 5,000 HP Electric Driver Reciprocating Compressors

25 Pa Code § 127.13(b) states:

(b) If the construction, modification or installation is not commenced within 18 months of the issuance of the plan approval or if there is more than an 18-month lapse in construction, modification, or installation, a new plan approval application that meets the requirements of this subchapter and Subchapters D and E (relating to prevention of significant deterioration of air quality; and new source review) shall be submitted. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified.

Condition 12 of the January 17, 2018 GP5 states:

The authorization to construct and/or operate a natural gas compression and/or processing facility under this General Permit is granted for a fixed period of five (5) years except that the authorization to construct a facility will expire eighteen (18) months from the date of the Department authorization if the owner or operator fails to commence construction. If construction commences within eighteen (18) months of the date of receipt of authorization from the Department, but it is not yet completed, the authorization to construct the facility under this General Permit is automatically extended, provided there is no subsequent lapse in construction activity of eighteen (18) months or more, up to a maximum of five (5) years from the date of issuance of the Department's authorization. If the construction, modification or installation is not commenced within eighteen (18) months of the authorization of this GP-5 or if there is more than an 18-month lapse in construction, modification or installation, a new application for the authorization to use GP-5 shall be submitted to the Department. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified.

Under the January 17, 2018 GP5 (Condition 12) and Department regulation (25 Pa. Code § 127.13(b)), if a lapse in construction of more than 18 months occurred after construction commenced on

air contamination sources at the HCG Plant a new authorization (general permit authorizations or plan approval) would be required before construction could commence on any unconstructed air contamination sources originally authorized by the January 17, 2018 GP5 and January 17, 2018 GP1.

A lapse in construction of greater than 18 months has occurred at the HCG Plant. The lapse began no later than April 17, 2020, the date of MarkWest's notification letter and continues to the present, a period of at least two years. Accordingly, by operation of law, MarkWest no longer has authorization under the Air Pollution Control Act and regulations to construct HGC Plant 2, the remaining Electric Compressors, and the second Cryo Mol Sieve Regen Heater (H-2711), identified in the January 17, 2018 GP5 and January 17, 2018 GP1.

The termination of construction authorization does not affect MarkWest's authorization to operate the timely constructed HCG Plant 1 and associated air contamination sources pursuant to the January 17, 2018 GP5 and January 17, 2018 GP1. Nor does the termination of construction authorization affect the Department's processing of MarkWest's pending application GP5-63-01011B for modifications to HGC Plant 1 and existing heaters currently operating under GP1-63-01011A or MarkWest's pending Request for Determination RFD-63-01011C for the existing amine unit, closed drain tank, and cryogenic processing plant capacity increase as it pertains to HCG Plant 1.

For any questions regarding this matter please do not hesitate to contact Ed Orris via email at eorris@pa.gov or via telephone at 412.442.4168 or me via email at mgorog@pa.gov or via telephone at 412.442.4150.

Sincerely,

Mark R. Gorog/MRG

Mark R. Gorog , P.E.
Air Quality Program Manager
Air Quality Program

CC: File 63-01011 (E. Orris) Operations (A. Fabrizi) Harrisburg C.O. (Permits)