

DEPARTMENT OF ENVIRONMENTAL CONSERVATION
AIR QUALITY CONTROL MINOR PERMIT

Minor Permit: AQ0062MSS02

Preliminary Date – November 20, 2025

The Alaska Department of Environmental Conservation (Department), under the authority of AS 46.14 and 18 AAC 50, issues Air Quality Control Minor Permit AQ0062MSS02 to the Permittee listed below.

Permittee: **Hilcorp Alaska, LLC**
3800 Centerpoint Dr., Suite 1400
Anchorage, AK 99503

Stationary Source: **Anna Platform**

Location: 60° 58' 36.98" N, 151° 18' 47.99" W

Project: Relocation of the Spartan 151 Drill Rig

Permit Contact: Drew Anderson
(907) 777-8488
ananderson@hilcorp.com

The Permittee submitted an application for Minor Permit AQ0062MSS02 under 18 AAC 50.502(c)(2)(A) for relocation of a portable oil and gas operation. This permit satisfies the obligation of the Permittee to obtain a minor permit under 18 AAC 50. As required by AS 46.14.120(c), the Permittee shall comply with the terms and conditions of this permit.

James R. Plosay, Manager
Air Permits Program

Table of Contents

Abbreviations and Acronyms	iii
Section 1 Emissions Unit Inventory	1
Section 2 Fee Requirements.....	3
Section 3 Ambient Air Quality Protection Requirements.....	4
Section 4 Recordkeeping, Reporting, and Certification Requirements	6
Section 5 Standard Permit Conditions	7
Section 6 Permit Documentation	8
Section 7 Notification Form.....	9
APPENDIX A: Emissions Calculations	i
APPENDIX B: Modeling Report.....	ii

Abbreviations and Acronyms

AAAQS	Alaska Ambient Air Quality Standards	NRE	nonroad engine
AAC	Alaska Administrative Code	PM ₁₀	particulate matter less than or equal to a nominal 10 microns in diameter
ADEC	Alaska Department of Environmental Conservation	PM _{2.5}	particulate matter less than or equal to a nominal 2.5 microns in diameter
AOS	Air Online Services	ppmw	parts per million by weight
AS	Alaska Statutes	PSD	prevention of significant deterioration
CFR	Code of Federal Regulations	PTE	potential to emit
CAA	Clean Air Act	SIP	State Implementation Plan
CO	carbon monoxide	SO ₂	sulfur dioxide
Department	Alaska Department of Environmental Conservation	The Act	Clean Air Act
EPA	US Environmental Protection Agency	TPY	tons per year
EU	emissions unit	VOC	volatile organic compound [as defined in 40 CFR 51.100(s)]
hp	horsepower		
ID	identification		
NO _x	nitrogen oxides		

Section 1 Emissions Unit Inventory

Emissions Unit (EU) Authorization. The Permittee is authorized to operate the Spartan 151 Drill Rig and associated equipment at Anna Platform in accordance with the terms and conditions of this permit. The Spartan 151 Drill Rig and associated equipment may consist of the emissions units (EUs) listed in Table 1. The information in Table 1 is for identification purposes only, unless otherwise noted in the permit. The specific EU descriptions do not restrict the Permittee from replacing an EU identified in Table 1.

Table 1 – EU Inventory

EU ID	EU Description	Make/Model	Fuel Type	Rating/ Max Capacity	Construction Date	NRE Status ¹
S1	Rig Engine No. 1	Caterpillar D-399	Diesel	1,100 hp	1981	Yes
S2	Rig Engine No. 2	Caterpillar D-399	Diesel	1,100 hp	1981	Yes
S3	Rig Engine No. 3	Caterpillar D-398	Diesel	970 hp	1981	Yes
S4	Rig Engine No. 4	Caterpillar D-398	Diesel	970 hp	1981	Yes
S5	Rig Engine No. 5	Caterpillar D-398	Diesel	970 hp	1981	Yes
S6	Rig Engine No. 6	Caterpillar D-398	Diesel	970 hp	1981	Yes
S7	Rig Engine No. 7	Caterpillar D-398	Diesel	970 hp	1981	Yes
S8	Crane Engine No. 1	Caterpillar D-3306	Diesel	300 hp	1981	Yes
S9	Crane Engine No. 2	Detroit Diesel 671	Diesel	285 hp	1981	Yes
S10	Cement Pump Engine No. 1	TBD	Diesel	490 hp	1981	Yes
S11	Cement Pump Engine No. 2	TBD	Diesel	490 hp	1981	Yes
S12	Diesel Tank No. 10	N/A	N/A	32,943 gal	1981	N/A
	Diesel Tank No. 11	N/A	N/A	646 gal	1981	
	Diesel Tank No. 12	N/A	N/A	28,663 gal	1981	
	Diesel Tank No. 13	N/A	N/A	3,305 gal	1981	
S13	Lifeboat Engine No. 1	TBD	Diesel	36 hp	1981	Yes
S14	Lifeboat Engine No. 2	TBD	Diesel	36 hp	1981	Yes

Notes:

- EU IDs S1 through S11, S13, and S14 are nonroad engines (NREs). EUs classified as NREs must meet the definition of “nonroad engine” at 40 C.F.R. 1068.30, Subpart A.
- The Permittee shall comply with all applicable provisions of AS 46.14 and 18 AAC 50 when installing a replacement EU, including any applicable minor or construction permit requirements.

- 2. Verification of Equipment Specifications and Maintenance of Equipment.** The Permittee shall install and maintain the equipment listed in Table 1 according to the manufacturer's or operator's maintenance procedures. Keep a copy of the manufacturer's or operator's maintenance procedure onsite and make records available to the Department personnel upon request. The records may be kept in electronic format.

Section 2 *Fee Requirements*

- 3. **Fee Requirements.**** The Permittee shall pay to the Department all assessed permit fees. Fee rates are set out in 18 AAC 50.400 – 499.

Section 3 *Ambient Air Quality Protection Requirements*

4. To protect the 1-hour, 3-hour, 24-hour, and annual SO₂ Alaska Ambient Air Quality Standards (AAAQS), the Permittee shall limit the sulfur content of the liquid fuel burned by the Spartan 151 Drill Rig EUs listed in Table 1 while at Anna Platform to no more than 15 ppmw.
 - 4.1 The Permittee shall do one of the following for each shipment of fuel for the Spartan 151 Drill Rig:
 - a. If the fuel grade requires a sulfur content of 15 ppmw or less, keep receipts that specify the fuel grade and amount of fuel; or
 - b. If the fuel grade does not require a sulfur content of 15 ppmw or less, keep receipts that specify the fuel grade and amount of fuel and:
 - (i) test the fuel for sulfur content; or
 - (ii) obtain test results showing the sulfur content of the fuel from the supplier or refinery; the test results must include a statement signed by the supplier or refinery of what fuel they represent.
 - c. Fuel testing under Condition 4.1 must follow an appropriate method listed in 18 AAC 50.035(b) through (c) or 40 CFR 60.17 incorporated by reference in 18 AAC 50.040(a)(1).
 - d. The Permittee shall include in the operating report required by the applicable operating permit issued for the stationary source under AS 46.14 and 18 AAC 50:
 - (i) a list of the fuel grades received at the Spartan 151 Drill Rig during the reporting period; and
 - (ii) copies of any test results obtained in accordance with Condition 4.1b.
 - e. If the sulfur content of any liquid fuel exceeds the limit in Condition 4, the Permittee shall report as described in Excess Emissions and Permit Deviation report required in the applicable operating permit issued for the stationary source under AS 46.14 and 18 AAC 50.
5. To protect the annual NO₂, 24-hour PM₁₀, annual PM_{2.5}, and 1-hour, 3-hour, 24-hour, and annual SO₂ AAAQS, the Permittee shall limit the cumulative rated capacity of the nonroad engines on the Spartan 151 Drill Rig while at Anna Platform to no more than 8,615 horsepower (hp).¹

¹ The Lifeboat engines, EU IDs S13 and S14, are part of the Spartan 151 Drill Rig EU inventory but were excluded from Hilcorp's modeling analysis. Therefore, these EUs are not included in the NRE cumulative power rating limit in Condition 5. "These EUs are extremely small, rated at 36 hp each, and are intended to be used for brief periods and only in the event that an emergency evacuation is necessary. Therefore, their potential impact to ambient air quality is negligible." [Ref. Minor Permit AQ0066MSS02 TAR, Appendix A - Modeling Report, Section 3.6.1, April 5, 2019]

- 5.1 The Permittee shall monitor, record, and report as follows:
- a. Any time a change is made to the Spartan 151 Drill Rig NRE EU inventory (excluding EU IDs S13 and S14), calculate and record the total nonroad engine rated capacity in hp.
 - b. If the Spartan 151 Drill Rig is at Anna Platform during the reporting period, include the rig's total NRE rated capacity in hp in the operating report required by the applicable operating permit issued for the stationary source under AS 46.14 and 18 AAC 50.
 - c. Report as described in Excess Emissions and Permit Deviation report required in the applicable operating permit issued for the stationary source under AS 46.14 and 18 AAC 50 any time the rig's total NRE rated capacity exceeds the limit in Condition 5.

Section 4 Recordkeeping, Reporting, and Certification Requirements

6. **Certification.** The Permittee shall certify any permit application, report, affirmation, or compliance certification submitted to the Department and required under the permit by including the signature of a responsible official for the permitted stationary source following the statement: “*Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.*” Excess emissions reports must be certified either upon submittal or with an operating report required for the same reporting period. All other reports and other documents must be certified upon submittal.
 - 6.1 The Department may accept an electronic signature on an electronic application or other electronic record required by the Department if the person providing the electronic signature
 - a. uses a security procedure, as defined in AS 09.80.190, that the Department has approved; and
 - b. accepts or agrees to be bound by an electronic record executed or adopted with that signature.
7. **Submittals.** Unless otherwise directed by the Department or this permit, the Permittee shall submit to the Department one certified copy of reports, compliance certifications, and/or other submittals required by this permit. The Permittee may submit the documents electronically or by hard copy.
 - 7.1 Submit the certified copy of reports, compliance certifications, and/or other submittals in accordance with the submission instructions on the Department’s Standard Permit Conditions web page at <http://dec.alaska.gov/air/air-permit/standard-conditions/standard-condition-xvii-submission-instructions/>.

Section 5 *Standard Permit Conditions*

8. The Permittee must comply with each permit term and condition. Noncompliance with a permit term or condition constitutes a violation of AS 46.14, 18 AAC 50, and, except for those terms or conditions designated in the permit as not federally enforceable, the Clean Air Act, and is grounds for
 - 8.1 an enforcement action; or
 - 8.2 permit termination, revocation and reissuance, or modification in accordance with AS 46.14.280.
9. It is not a defense in an enforcement action to claim that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with a permit term or condition.
10. Each permit term and condition is independent of the permit as a whole and remains valid regardless of a challenge to any other part of the permit.
11. The permit may be modified, reopened, revoked and reissued, or terminated for cause. A request by the Permittee for modification, revocation and reissuance, or termination or a notification of planned changes or anticipated noncompliance does not stay any permit condition.
12. The permit does not convey any property rights of any sort, nor any exclusive privilege.
13. The Permittee shall allow the Department or an inspector authorized by the Department, upon presentation of credentials and at reasonable times with the consent of the owner or operator to
 - 13.1 enter upon the premises where an emissions unit subject to this permit is located or where records required by the permit are kept;
 - 13.2 have access to and copy any records required by this permit;
 - 13.3 inspect any stationary source, equipment, practices, or operations regulated by or referenced in the permit; and
 - 13.4 sample or monitor substances or parameters to assure compliance with the permit or other applicable requirements.

Section 6 *Permit Documentation*

<u>Date</u>	<u>Document Details</u>
October 18, 2024	Application Received
April 8, 2025	Early notification of Minor Permit AQ0062MSS02 sent to affected local and tribal government leaders.
August 13, 2025	Preliminary draft Minor Permit AQ0062MSS02 and TAR sent to Hilcorp for pre-public notice technical review.

Section 7 Notification Form²

Anna Platform
Stationary Source Name
Hilcorp Alaska, LLC
Company Name

AQ0062MSS02
Air Quality Permit Number

When did you discover the Excess Emissions/Permit Deviation?

Date: ____ / ____ / ____

Time: ____ : ____

When did the event/deviation occur?

Begin: Date: ____ / ____ / ____

Time: ____ : ____ (please use 24-hr clock)

End: Date: ____ / ____ / ____

Time: ____ : ____ (please use 24-hr clock)

What was the duration of the event/deviation? ____ : ____ (hrs:min) or ____ days

(total # of hrs, min, or days, if intermittent then include only the duration of the actual emissions/deviation)

Reason for Notification (Please check only 1 box and go to the corresponding section.):

Excess Emissions - Complete Section 1 and Certify

Note: All "excess emissions" are also "permit deviations." However, use only Section 1 for events that involve excess emissions.

Deviation from Permit Conditions - Complete Section 2 and Certify

Note: Use only Section 2 for permit deviations that do not involve excess emissions.

Deviation from COBC³, CO⁴, or Settlement Agreement - Complete Section 2 and Certify

² Revised as of July 22, 2020.

³ Compliance Order By Consent

⁴ Compliance Order

Section 1. Excess Emissions

(a) **Was the exceedance** Intermittent or Continuous

(b) **Cause of Event** (Check one that applies. Complete a separate form for each event, as applicable.):

- | | |
|--|--|
| <input type="checkbox"/> Start Up/Shut Down | <input type="checkbox"/> Natural Cause (weather/earthquake/flood) |
| <input type="checkbox"/> Control Equipment Failure | <input type="checkbox"/> Scheduled Maintenance/Equipment Adjustments |
| <input type="checkbox"/> Bad fuel/coal/gas | <input type="checkbox"/> Upset Condition |
| <input type="checkbox"/> Other _____ | |

(c) **Description**

Describe briefly what happened and the cause. Include the parameters/operating conditions exceeded, limits, monitoring data and exceedance. Attach supporting information if necessary.

(d) **Emissions Units (EU) Involved:**

Identify the emissions units involved in the event, using the same identification number and name as in the permit. Identify each emission standard potentially exceeded during the event and the exceedance.

EU ID	EU Name	Permit Condition Exceeded/Limit/Potential Exceedance

(e) **Type of Incident:** (Please check all that apply and provide the value requested, if any):

Opacity _____%

Venting _____(gas/scf)

Control Equipment Down

Fugitive Emissions

Emission Limit Exceeded

Marine Vessel Opacity

Flaring

Other: _____

(f) **Corrective Actions:**

Describe actions taken to restore the system to normal operation and to minimize or eliminate chances of a recurrence. Attach supporting information if necessary.

(g) **Unavoidable Emissions:**

Do you intend to assert that these excess emissions were unavoidable?

YES

NO

Do you intend to assert the affirmative defense of 18 AAC 50.235?

YES

NO

Certify Report (go to end of form)

Section 2. Permit Deviations

(a) **Permit Deviation Type:** (Check all boxes that apply per event. Complete a separate form for each event, as applicable.)

- Emissions Unit-Specific Requirements
- Stationary Source-Wide Specific Requirements
- Monitoring/Recordkeeping/Reporting Requirements
- General Source Test Requirements
- Compliance Certification Requirements
- Standard/Generally Applicable Requirements
- Insignificant Emissions Unit Requirements
- Other: _____

(b) **Emissions Units (EU) Involved:**

Identify the emissions units involved in the event, using the same identification number and name as in the permit. List the corresponding permit condition and the deviation.

EU ID	EU Name	Permit Condition /Potential Deviation

(c) **Description of Potential Deviation:**

Describe briefly what happened and the cause. Include the parameters/operating conditions and the potential deviation. Attach supporting information if necessary.

(d) Corrective Actions:

Describe actions taken to correct the deviation or potential deviation and to prevent future recurrence. Attach supporting information if necessary.

Certification:

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

Printed Name: _____ Title _____ Date _____

Signature: _____ Phone number _____

NOTE: *This document must be certified in accordance with 18 AAC 50.345(j). Read and sign the certification in the bottom of the form above. (See Condition 6.)*

Beginning September 7, 2023, Excess Emissions and Permit Deviations must be submitted through the AOS Permittee Portal at <http://dec.alaska.gov/applications/air/airtoolsweb/>.

This Notification Form may only be used to satisfy the reporting requirements if the Department has approved alternative reporting options in writing prior to submittal.

[18 AAC 50.346(b)(3)]