In the Matter of Williams Field Services Group, LLC Cureton Intermediate Holdco, LLC Docket No. MM-08-2025-0001

APPENDIX

EPA Disclosure Dates 4/17/2025 4/17/2025	Facility Name Hookside Facility Kersey Compressor Station	Description of Facility Operations Natural Compressor Station Gas Natural Compressor Station Gas	Program RCRA RCRA	6 CCR 1007-3 Part 279.22(c)(1) 6 CCR 1007-3 262.14(a)(2)	Description of Issue or Finding Identified Tote of what appeared to be used oil located in the compressor building was not labeled (and was not included in the SPCC plan). The facility was likely a VSQG. However, at the time of the audit it appeared the facility had accumulated 12-55 gallon drums of discarded materials. Two of the drums were rusty, unmarked, bulging and still had the manufacturers seals intact. If these drums contained flammable or other hazardous materials the facility could have been a SQG or LQG.	Corrective Action The facility promptly marked the tote with an appropriate "Used Oil" label after the onsite audit. The facility made arrangements to classify and appropriately dispose of the discarded drums after the onsite audit.	Date Discovered and Communicated to Williams 2/4/2025 2/4/2025	Corrective Action Due Date 4/17/2025 4/17/2025	Corrective Action Closed Date 4/2/2025 3/12/2025
4/17/2025	Front Range Gas Plant	Natural Gas Plant	RMP	40 CFR 68.175 Prevention program/Program 3.	The following RMP submittal data element information requires correction: 1.3 Other EPA Systems Facility ID is blank, add the TRI or EPA Registry ID number. 1.5.g.+ Facility Latitude and Longitude location is not correct. Update the facility information for these data elements. 1.1.2.b. EPCRA 302: Current response is Yes. The facility is not subject to EPCRA 302 notification requirements, this data element should be left blank. 1.12.d. Air Operating Permit ID: Current response is the draft TV Operating permit number 210PWE445. The permit has not been issued, this data element should be left blank. 7.4.f.2. Mitigation Systems in Use: Dikes - Current response is Yes. Dikes are not used to mitigate a spill of NGL, this data element should be left blank. 9.8.c. Clean Water Regulations at 40 CFR 112: Current response is blank, this data element should be Yes. 9.8.e. OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254: Current response is blank, this data element should be Yes.	The facility updated the RMP submittal	2/6/2025	4/17/2025	3/13/2025
4/17/2025	Front Range Gas Plant	Natural Gas Plant	RMP	40 CFR 68.165 Offsite Consequences Analysis	RMP Submittal Data Elements - Section 4. Flammables Worst Case Release Scenario 4.7 Estimated residential population within distance to endpoint (numbers): "0" The residential population based on 2020 census data is 26 people within the 0.4 mile distance to endpoint. Update population to 26 people. EPA guidance refers to this website to get current census data: https://mcdc.missouri.edu/applications/caps2020. html 4.8.9. Public Receptors within Distance to Endpoint - Other Type: "Local Roads" - Remove, per EPA guidance roads are not public receptors. https://www.epa.gov/rmp/are-roads-considered- public-receptors	The facility updated the RMP submittal	2/6/2025	4/17/2025	3/13/2025

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Jun 11, 2025

2:09 pm U.S. EPA REGION 8

HEARING CLERK

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EPA Disclosure Dates	Facility Name	Description of Facility Operations	; Progran	n Reference	Description of Issue or Finding Identified	Corrective Action	Date Discovered and Communicated to Williams	Corrective Action Due Date	Corrective Action Closed Date
4/17/2025	Front Range Gas Plant	Natural Gas Plant	RMP	40 CFR 68.95(a)(1) Emergency Response Program	RMP Submittal Data Elements - Section 9. Emergency Response 9.1.b Facility Plan (Does facility have its own written emergency response plan?): "Yes" We understand that that the facility is a	The facility updated the RMP submittal	2/6/2025	4/17/2025	3/13/2025
4/17/2025	Speer Gas Plant	Natural Gas Liquids Stabilization Facility	RMP	40 CFR 68.160 Registration	RMP submittal data element errors that require correction: 1.3 Other EPA Systems Facility ID: Add the TRI or EPA Registry ID number.	The facility updated the RMP submittal	2/6/2025	4/17/2025	3/13/2025
4/17/2025	Speer Gas Plant	,	RMP	Emergency	RMP Submittal Data Elements - Section 9. Emergency Response 9.1.b Facility Plan (Does facility have its own written emergency response plan?): Current response is Yes. We understand that that the facility is a non- responding stationary source with an emergency action plan. The correct response to this data element is No.	The facility updated the RMP submittal	2/6/2025	4/17/2025	3/13/2025
4/17/2025	Gilcrest Gas Plant	Natural Gas Plant	Air	Permit GP02 Condition IX.D.	AIRS 043 began operation in sometime in 12/2020 and AIRS 044 sometime 01/2021. NOS for points 043 and 044 were therefore due no later than 01/2021. No record of an NOS was located in available public records.	Plant is shut down	2/5/2025	4/17/2025	12/31/2023
Observation State Only Requirement	Hookside Facility	Natural Gas Compressor Station	Air	Permit GP02 Condition III.C.	AIRS 025 and AIRS 026 were labeled on the engines appropriately but were missing the permit number.	The facility marked AIRS IDs on equipment	2/5/2025	4/17/2025	2/25/2025
4/17/2025	Kersey Compressor Station	Natural Gas Compressor Station	Air		C-311 was replaced under the temporary AOS provision of the GP02 on 03/08/2023. An application was submitted in 05/2023 to permit what was then determined to be a permanent replacement engine. The permit was issued on 01/02/2024, 300 days after the initial placement. The engine did not run for 13 days throughout the period for a total of 277 days of operation as an AOS replacement. The GP02 allows temporary replacement under the AOS for no more than 270 days; therefore, there were 7 days where the engine was operated without permit authorization.	Source obtained a stationary source permit on 1/2/2024	2/5/2025	4/17/2025	1/2/2024
	Tiger Compressor Station	Natural Gas Compressor Station	Air	5 CCR 1001-5 Regulation 3 Part B Section III.E.	AIRS ID and Permit number for Point 007 was not marked on the equipment.	The facility marked AIRS IDs on equipment	2/5/2025	4/17/2025	2/25/2025
State Only	Wiedeman Compressor Station	Natural Gas Compressor Station	Air	5 CCR 1001-5 Regulation 3 Part B Section III.E.	AIRS ID and Permit number for Point 001 and Point 003 were not marked on the equipment	The facility marked AIRS IDs on equipment	2/5/2025	4/17/2025	3/10/2025