DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: On-site Inspection

N733070226

FACILITY: NorthStar Energy LLC - Hudson 34		SRN / ID: N7330		
LOCATION: 04950 Camp Ten Rd, BOYNE FALLS		DISTRICT: Cadillac		
CITY: BOYNE FALLS		COUNTY: CHARLEVOIX		
CONTACT:		ACTIVITY DATE: 12/20/2023		
STAFF: David Bowman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT		
SUBJECT: Scheduled inspection FY24. Site has been closed and is part of the Orphan Well Program.				
RESOLVED COMPLAINTS:				

On 20 December 2023 I, David Bowman MI EGLE AQD, conducted a site inspection of N7330 an Optout source. The source was operating under the conditions of Permit to Install (PTI) 35-04E and PTI 37-04. The companies that operated the site went out of business and on 15 September 2021 the site was incorporated into the Orphan Well Program, defined in Section 61601(g) of Part 616, Orphan Well Fund, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA). Signage at the gate has been removed. There is one blank sign plate only.

The last inspection that confirmed operation was 6 May 2020 and the last inspection on 23 Oct 2020 was to confirm the transfer to new owners and found the site not operating and that no new ownership signage was up. The report indicated that the AQD was awaiting official notice of new ownership, but there is no record it was ever submitted, only the notice that North Star was no longer the owner.

The company that operated the site, North Star Energy, no longer exist and no records are available for review. There is an office space on the site. I was not able to locate any operational records in the files. The site is in process of being dismantled and currently the OGMD Orphan Wells Program is working with contractors to complete removal plans and work.

The site inspection verified that the source is not operating; however, PTI 35-04E one of the current PTIs that cover the site. PTI 35-04E covers the natural gas processing for the site. The engines detailed in PTI 35-04E have been removed. The piping is disconnected, and the buildings are either removed or have fallen in on themselves from disuse and lack of repair. There are two iron sponges on site; One approximately 3-400 bbl blow down tank present in secondary containment; Two FLAMECO heater/treaters with a data plate indicating it as a 2.5 MMBtu/hr heater (SN 0412-605 and SN 0610-810) making them exempt from permitting requirements per R 282(2)(b)(i); and a DEHY that appears to be exempt by rule 285(b)(ii) and 40 CFR 63 Part HH exemption 63.764(e)(ii) due to not emitting benzene (It is referenced in the permit review for PTI 35-04E). There is no equipment present at the site that is included in PTI 35-04E and therefore it can be voided.

All other equipment that is apparent to the processes allowed in PTI 35-04E appears to be removed from the process and either gone from the site or staged for removal at the east edge of the fence line.

PTI 37-04 allowed for the Methyl diethanolamine (MDEA) separation process for removing CO2 from the natural gas stream. This PTI should be voided also.

It appears that the following PTI changes occurred around the MDEA CO2 removal process system:

PTI number	Submission Date	Approval Date	Void Date
37-04	2/6/2004	3/29/2004	NA
35-04A	7/27/2005	12/5/2005	11/23/2007
35-04B	12/11/2006	1/23/2007	5/22/2007
35-04E	9/17/2018	1/23/2019	NA

What Appears to have happened is that PTI 37-04 was issued to PLC Pipeline Company at the site location known as Hudson -34. When Aurora Energy applied for PTI 35-04A and 34-04B they asked that the CO2 plant be incorporated into those PTIs and that PTI 37-04 was either overlooked or not voided. When North Star Energy requested the changes for PTI 35-04E they requested that the CO2 plant be removed since it was disconnected and out of service for several years. It does not appear that there was ever more than one CO2 plant at the location.

Last emission reporting was in CY2019. In that report two compressors and one dehy was listed.