

Department of Environmental Quality  
Permitting and Compliance Division  
Air and Waste Management Bureau  
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DRAFT ENVIRONMENTAL ASSESSMENT

ISSUED TO: KCS Mountain Resources, Inc.  
P.O. Box 78  
Worland, WY 82401

NOV 30 1998

ENVIRONMENTAL  
QUALITY COUNCIL

PERMIT NUMBER: 1739-01

PRELIMINARY DETERMINATION ON PERMIT ISSUED: 11/25/98

**MONTANA ENVIRONMENTAL POLICY ACT (MEPA) COMPLIANCE:** An environmental assessment required by the Montana Environmental Policy Act, was completed for this project as follows:

**LEGAL DESCRIPTION OF SITE:** The natural gas compressor station and gas plant is located in the SW¼ of Section 18, T34N, R1W in Toole County. This facility is known as the Kevin Sunburst Compressor Station and Gas Plant.

**DESCRIPTION OF PROJECT:** Permit #1739-01 is being issued to update permit #1739 because a new compressor engine has been installed to replace the 625 HP Waukesha 7042 NA compressor engine and the ownership of the facility has changed from Oil International Ltd. to Natural Gas Processing Co. and finally to KCS since the original permit was issued on March 10, 1983. In addition, the gas conditioning plant has been abandoned.

**BENEFITS AND PURPOSE OF PROPOSAL:** This permit allows KCS to continue operation of the engine in compliance with the rules and regulations and establishes federally enforceable emission limits on the 500 HP Caterpillar G399 natural gas compressor engine. Also, this new compressor engine will have Non-Selective Catalytic Reduction (NSCR) and an Air Fuel to Ratio Controller which will reduce the potential emissions of both oxides of nitrogen (NOx) and carbon monoxide (CO).

**DESCRIPTION AND ANALYSIS OF REASONABLE ALTERNATIVES WHENEVER ALTERNATIVES ARE REASONABLY AVAILABLE AND PRUDENT TO CONSIDER:** No reasonable alternatives are available.

**A LISTING AND APPROPRIATE EVALUATION OF MITIGATION, STIPULATIONS AND OTHER CONTROLS ENFORCEABLE BY THE AGENCY OR ANOTHER GOVERNMENT AGENCY:** A listing of the enforceable permit conditions and a permit analysis, including a Best Available Control Technology analysis, is contained in permit #1739-01.

**DESCRIPTION AND ANALYSIS OF REGULATORY IMPACTS ON PRIVATE PROPERTY RIGHTS:** The department has considered alternatives to the conditions imposed in this permit as part of the permit development. The department has determined that the permit conditions are reasonably necessary to ensure compliance with applicable requirements and to demonstrate compliance with those requirements and do not unduly restrict private property rights.

Potential Impact on Physical Environment							
		Major	Moderate	Minor	None	Unknown	Comments Included
1	Terrestrial and Aquatic Life and Habitats				X		yes
2	Water Quality, Quantity and Distribution				X		yes
3	Geology and Soil Quality, Stability and Moisture				X		yes
4	Vegetation Cover, Quantity and Quality				X		yes
5	Aesthetics				X		yes
6	Air Quality			X			yes
7	Unique Endangered, Fragile or Limited Environmental Resource				X		yes
8	Demands on Environmental Resource of Water, Air and Energy				X		yes
9	Historical and Archaeological Sites				X		yes
10	Cumulative and Secondary Impacts			X			yes

Potential Impact on Human Environment							
		Major	Moderate	Minor	None	Unknown	Comments Included
1	Social Structures and Mores				X		yes
2	Cultural Uniqueness and Diversity				X		yes
3	Local and State Tax Base and Tax Revenue				X		yes
4	Agricultural or Industrial Production				X		yes
5	Human Health			X			yes
6	Access to and Quality of Recreational and Wilderness Activities				X		yes
7	Quantity and Distribution of Employment				X		yes
8	Distribution of Population				X		yes
9	Demands for Government Services				X		yes
10	Industrial and Commercial Activity				X		yes
11	Locally Adopted Environmental Plans and Goals			X			yes
12	Cumulative and Secondary Impacts			X			yes

SUMMARY OF COMMENTS ON POTENTIAL IMPACTS: The following comments have been prepared by the Department.

### Potential Impact on Physical Environment

1. Terrestrial and Aquatic Life and Habitats

This permitting action will not result in an increase in allowable emissions for any air pollutant at the facility. Therefore, no impacts to the habitats of fish or wildlife should occur.

2. Water Quality, Quantity and Distribution

The actions addressed in this permit will not result in a change in the amount or characteristics of surface water discharged or the alteration of the course or magnitude of any drainage system. This action does not result in a change in the quality or quantity of ground water. Therefore, no impacts to water quality, quantity and distribution are anticipated.

3. Geology and Soil Quality, Stability and Moisture

This project does not involve any disturbance of land. The actions addressed will not change the soil stability or geologic substructure or result in any increased disruption, displacement, erosion, compaction, or moisture loss which would reduce productivity or fertility at or near the site. No unique geologic or physical features will be disturbed. Therefore, no impacts to geology and soil quality, stability and moisture are anticipated.

4. Vegetation Cover, Quantity and Quality

This project does not involve any disturbance of land or increases in emissions of any air pollutant; therefore, no impacts to the diversity, productivity or abundance of plant species should occur.

5. Aesthetics

This project does not involve any new construction. The aesthetic character of the project site will not change, nor will noise levels. All construction occurred prior to 1985.

6. Air Quality

This permitting action will not adversely affect air quality. In fact, replacing the compressor engine actually decreases potential emissions of NO<sub>x</sub> and CO. In addition, the permit will establish federally enforceable permit limits for NO<sub>x</sub> and CO.

7. Unique Endangered, Fragile or Limited Environmental Resources

This permitting action should not result in any impacts to terrestrial and aquatic life and/or their habitat as no new emissions or disturbances are taking place as a result of this permit issuance. Furthermore, the department is not aware of any unique, rare, threatened, or endangered species in the area surrounding the facility.

8. Demand for Environmental Resources of Water, Air, and Energy

This permitting action will not create any new demands for water, air, or energy. In fact, energy demands may actually decrease because the compressor engine is smaller than its predecessor.

9. Historical and Archaeological Sites

This permitting action does not include any facility action that would result in disturbing a greater land surface. Therefore, no impacts to any historical and archaeological sites are anticipated.

10. Cumulative and Secondary Impacts

This project does not involve any disturbance of land or increases of emissions of any air pollutant; therefore, no cumulative and secondary impacts should result to terrestrial and aquatic habitats and air quality.

**Potential Impact on Human Environment**

1. Social Structures and Mores
2. Cultural Uniqueness and Diversity
8. Distribution of Population

Since no significant physical or operational changes at the facility were permitted in #1739-01, the location, distribution, density, or growth rate of the human population or the cultural uniqueness or diversity of the community surrounding the facility should not be altered. The fundamental moral views of a social group are not anticipated to be altered as a result of this permitting action.

3. Local and State Tax Base and Tax Revenue
9. Demands of Government Services

The changes to air quality permit #1739-01 will not result in a need for new or altered governmental services nor effect local or state tax bases or revenues.

4. Agricultural or Industrial Production
10. Industrial and Commercial Activity

The changes permitted in #1739-01 will not result in a reduction of available acreage or productivity of any agricultural land; therefore, agricultural production should not be affected. Industrial production and commercial activity at the facility or in the neighboring area are not anticipated to be altered by this permit.

5. Human Health

The two primary vehicles for impact upon human health are water and air. Since there will be no change in the amount or characteristics of surface water discharged or the quality or quantity of ground water, human health impacts from water are not anticipated. Replacing the compressor engine actually decreases potential emissions of NOx and CO emissions. Therefore, minor human health impacts from air quality are possible

6. Access to and Quality of Recreational and Wilderness Activities

The actions permitted will not alter any existing access to and quality of any recreational or wilderness area.

7. Quantity and Distribution of Employment

The actions permitted by permit #1739-01 are not anticipated to result in any impacts to the quantity and distribution of employment at the facility or surrounding community.

11. Locally Adopted Environmental Plans and Goals

Permit #1739-01 should not adversely affect any locally adopted environmental plans or goals because it does not result in any increase of actual emissions.

12. Cumulative and Secondary Impacts

The two primary vehicles for impact upon human health are water and air. Since there are possibly minor air quality impacts from KCS, cumulative human health impacts are possible from the facility.

RECOMMENDATION: An EIS is not required.

IF AN EIS IS NOT REQUIRED, EXPLAIN WHY THE EA IS AN APPROPRIATE LEVEL OF ANALYSIS: There are no significant impacts from this facility and the analysis indicates compliance with all applicable air quality rules and regulations.

OTHER GROUPS OR AGENCIES CONTACTED OR WHICH MAY HAVE OVERLAPPING JURISDICTION: None.

INDIVIDUALS OR GROUPS CONTRIBUTING TO THIS EA: Department of Environmental Quality, Permitting and Compliance Division.

EA PREPARED BY: Angelia Haller

DATE: November 23, 1998