



November 1, 2023

Mr. James L. Semerad
Director, Division of Air Quality
North Dakota Department of Environmental Quality
918 East Divide Ave, 4th Floor
Bismarck, ND 58501

Re: Response to AIRFCE-039520

Dear Mr. Semerad:

Hess Tioga Gas Plant LLC (“Hess”) appreciates the opportunity to respond to the inspection report dated September 20, 2023, regarding the inspection performed on August 21, 2023, and published by the North Dakota Department of Environmental Quality (“DEQ”) in the Combined Environmental Reporting Information System - North Dakota (“CERIS-ND”).

I. Explanation of Circumstances

During the inspection, it was observed on the control room display that two of the four thermocouples for the process tip (EP S-5841) of the tri-tip flare (EU S-101) were not in operation. The DEQ recommended that Hess propose an alternative monitoring plan to monitor the presence of the pilot flames until the thermocouples can be replaced on the process flare (S-5841).

II. Corrective Actions

The thermocouples are non-retractable and cannot be replaced without a complete plant shutdown. Therefore, Hess proposes the installation of a thermal-imaging camera with the ability to communicate the loss of the pilot flame to the control room.

Due to the potential long lead-time for acquiring and installing such a camera, Hess further proposes to utilize a visible-light spectrum camera that may be viewed manually to verify the presence of a flame in the interim until a thermal imaging camera can be installed. Additionally, Hess plans to make daily observations with an Optical Gas Imaging (“OGI”) camera to verify presence the of pilot flame and will document each observation.

III. Actions for Future Compliance

Hess is committed to complying with its permit and working with DEQ to employ an acceptable alternative monitoring plan.

If you have questions regarding this information or should need additional clarification, please contact me at (701) 334-4264.

Sincerely,

HESS Corporation

A handwritten signature in black ink, appearing to read "Jesse Sparrow", written in a cursive style.

Jesse Sparrow
Sr. Specialist, Regulatory
Hess Corporation

Cc: DEQ (email)
Brent Lohnes, Hess (email)
Brian Epperson, Hess (email)
Vicky Sund, Hess (email)

McDaniel, Paige B.

From: McDaniel, Paige B.
Sent: Tuesday, November 7, 2023 2:13 PM
To: Sparrow, Jesse
Cc: Sund, Vicky; Epperson, Brian; Lohnes, Brent; Hansey, Brittany R.
Subject: RE: Hess Tioga Gas Plant Flare Pilot Alternative Monitoring Plan

Good Afternoon Jesse,

I have reviewed the proposed alternative monitoring plan to monitor the presence of the pilot flames of the tri-tip flare (EU S-101). The plan is acceptable to the Department and should fulfill the monitoring requirements of the Permit to Operate for the Tioga Gas Plant.

Please reach out to me with any concerns or questions.

Thank you,

Paige McDaniel
Environmental Scientist
Division of Air Quality
701-328-2381
pmcdaniel@nd.gov



From: Sparrow, Jesse <jsparrow@hess.com>
Sent: Wednesday, November 1, 2023 10:08 AM
To: McDaniel, Paige B. <pMcDaniel@nd.gov>; Fasching, Skye <skye.fasching@nd.gov>
Cc: Sund, Vicky <vsund@hess.com>; Epperson, Brian <bepperson@hess.com>; Lohnes, Brent <blohnes@Hess.com>
Subject: Hess Tioga Gas Plant Flare Pilot Alternative Monitoring Plan

***** **CAUTION:** This email originated from an outside source. Do not click links or open attachments unless you know they are safe. *****

Mrs. McDaniel/Mrs. Fasching,

Please see the attached alternative monitoring plan for the flare pilots of the tri-tip flare (EU S-101) at the Tioga Gas plant in response to the DEQ inspection dated August 21, 2023 and identified as AIRFCE-039520 in CERIS.

If you would like a copy uploaded directly into CERIS, please specify the desired form as the Air General Compliance Submittal form does not appear as an option under the Tioga Gas Plant.

Please reach out to me with any questions, concerns, or comments.

Regards,

Jesse Sparrow

HESS CORPORATION

Sr. Specialist, Regulatory

Cell: 701-334-4264

jsparrow@hess.com