

OWNER

Permit and Approvals Matrix and Schedule



Document No.: [REDACTED] REG-RPT-002

Rev. A, Issued for Review

Date: September 29, 2026

Project: [REDACTED] [REDACTED]



TORUS

[REDACTED], [REDACTED] County, [REDACTED]

N O T I C E

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ISSUE SUMMARY AND APPROVAL

This page records each issue of REG-RPT-002. The preparer, reviewer and approver sign for each revision.

Rev.	Date	Issue purpose	Description
A	2026-09-29	Issued for Review	First issue

Contributors

Rev.	Discipline	Prepared by	Reviewed by	Approved by
A	Regulatory			

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1. INTRODUCTION

1.1. PURPOSE

This report lists every permit, registration, notification, agreement and third-party approval needed to build and operate the . For each it gives the agency, the trigger, the typical lead time, the submittal content, the party responsible and the construction milestone by which it is needed. It identifies the approvals on the critical path and sets out an indicative permitting schedule.

1.2. SCOPE AND EXCLUSIONS

The report covers the station from inlet insulating joint IJ-101 to outlet insulating joint IJ-102, the outlet lateral to the tap valve of (the receiving pipeline operator), the access road and the construction workspace. The hot tap on the trunkline is the receiving pipeline operator's work; the approvals the Owner needs from it are included, but the operator's own internal approvals are not. The upstream lateral from the Owner's treating facility is a separate project and is excluded.

No item has been filed. Every item therefore carries the status HOLD. Lead times are typical planning values from comparable midstream projects and published agency timelines, and each shall be confirmed with the agency at the pre-application stage. The applicability conclusions behind this list come from REG-RPT-001, Regulatory Applicability and Compliance Matrix; REG-CAL-001, Air Emissions Inventory and Applicability; and REG-RPT-003, Environmental Desktop Review.

2. PLANNING BASIS

TORUS measured every lead time from week 1, the Owner's authorization to start permitting, which is assumed to run concurrently with detailed design. Table 2-1 gives the construction milestones used to state when each approval is needed. They are indicative and shall be aligned with the project schedule (EST-SCH series, to be issued in Volume 10) and CON-RPT-001, Construction Execution Plan.

Table 2-1: Construction Milestones Used for Need-by Dates

Key	Milestone	Indicative week
M0	Owner authorization to permit; site access for survey and geotechnical work	1
M1	Issued for construction package, sealed by the EOR	16
M2	Contractor mobilization and first earth disturbance	21
M3	Heavy equipment deliveries and critical lifts	30
M4	Hydrostatic testing	37
M5	Tie-in to the tap valve, nitrogen purge and gas-in	44
M6	Commissioning complete; first custody delivery	48
M7	Final stabilization and permit closeout	60



3. PERMITS AND APPROVALS

The tables in this section list the approvals by subject. Lead time is the number of weeks from a complete submittal to approval or effective coverage, plus preparation where noted.

3.1. PIPELINE SAFETY AND THE RECEIVING PIPELINE OPERATOR

Table 3-1 lists the agreements with the receiving pipeline operator and the pipeline safety filings. The interconnect agreement and the hot tap are the longest items on the project, and both are controlled by the receiving pipeline operator rather than by an agency.

Table 3-1: Pipeline Safety and Receiving Pipeline Operator Approvals

No.	Approval and trigger	Agency or party	Submittal content	Lead time, weeks	Responsible	Needed by
P-01	Interconnect and Operating Agreement: measurement, witness rights, data link, gas quality, acceptance of the overpressure shutdown setpoint (HOLD H-01)		Design basis, P&IDs, safety requirements specification SAF-SRS-001, measurement design MEA-CAL-001, SCADA point list	16 to 26	Owner	Design frozen at M1; signed before M5
P-02	Hot tap design, scheduling and execution on the live trunkline (HOLD H-04)		Tie-in drawing PIP-DWG-004, tie-in list MEC-LST-004, tap location, excavation plan, schedule window	12 to 20 for a crew slot	Owner requests; performs	Tap complete 4 weeks before M5
P-03	Encroachment and crossing agreement for work in the 50 ft right-of-way: excavation, equipment crossings, crane mats (HOLD H-04)		Work plan, crossing locations, equipment weights, cover and clearance, standby request	6 to 10	Owner, Contractor	Before work in the right-of-way, about M4

No.	Approval and trigger	Agency or party	Submittal content	Lead time, weeks	Responsible	Needed by
P-04	Operator registration and new construction notification (form and lead time TBV)	 , Pipeline Safety Department	Operator data, facility description, location, maximum allowable operating pressure, schedule	2 to 4	Owner	M2
P-06	Written 49 CFR 192.8 classification of the station and lateral; if transmission, the rupture-mitigation valve evaluation (192.179) and control room management evaluation (192.631) (HOLD H-18)	Owner, available to the Commission	Classification memorandum per REG-RPT-001	2, after the facts are known	Owner	M1
P-07	National Pipeline Mapping System submission of the as-built lateral	PHMSA	As-built centerline and attributes	Next annual cycle after M6	Owner	M7

3.2. AIR

Table 3-2 lists the air approvals. The station's potential to emit is 7.47 tons per year of volatile organic compounds and below 3 tons per year of every other criteria pollutant (REG-CAL-001), so no construction permit is expected. The Department of Environmental Quality () should still confirm the authorization route, because the volatile organic compound total is above the 5 tons per year de minimis level.

Table 3-2: Air Approvals

No.	Approval and trigger	Agency or party	Submittal content	Lead time, weeks	Responsible	Needed by
A-01	Permit-exempt facility confirmation or oil and gas permit-by-rule registration under 252:100-7 (whether registration is required before construction is TBV)	Air Quality Division	Emission inventory REG-CAL-001, equipment list, T-101 throughput limit and records plan, G-101 certificate, plot plan	4 to 12	Owner	Before M2
A-02	Legally and practicably enforceable T-101 throughput limit of 350 bbl/yr, 12-month rolling, which keeps the tank at 4.88 tons per year and below the 6 tons per year storage vessel threshold (liquids rate HOLD H-20)	through A-01 or a permit condition	Limit, monthly loadout tickets cross-checked against LT-191, rolling calculation, five-year records	With A-01	Owner	Before T-101 receives liquid, M5
A-03	EPA certificate of conformity for the G-101 engine under 40 CFR 60 Subpart JJJJ (HOLD H-15)	EPA, through the vendor	Certificate, hour meter, emergency rating	With the purchase order	Owner, vendor	Delivery, M3
A-04	OOOOb records: zero-emission controller design, storage vessel determination at the 350 bbl/yr limit, and the finding that the 183 scf/d analyzer vents are sample-system exhausts rather than controllers	Owner records; analyzer vent position confirmed with	Design record; storage vessel determination within 30 days of startup (TBV)	1	Owner	Startup, M5

Note 1: If the V-101 liquids rate cannot stay within the limit, the Owner will exercise bid alternate ALT-6, vapor control of T-101 by enclosed combustor (CON-RPT-002).

3.3. WATER, STORMWATER AND OIL

Table 3-3 lists the water and oil approvals. The permitting authority for construction stormwater and hydrotest water discharge is open (HOLD H-17). If the station is an oil and gas facility under jurisdiction, coverage comes from the EPA Region 6 Construction General Permit; otherwise it comes from the general permit OKR10. The stormwater pollution prevention plan CIV-RPT-002 is written to satisfy both, so only the notice of intent waits on the decision.

Table 3-3: Water, Stormwater and Oil Approvals

No.	Approval and trigger	Agency or party	Submittal content	Lead time, weeks	Responsible	Needed by
W-01	Construction stormwater coverage for 1 to 5 acres of disturbance (tract 2.41 acres plus access road)	EPA Region 6 or (HOLD H-17)	Notice of intent, stormwater pollution prevention plan, site map, receiving water, species and historic property eligibility	3 to 4 to prepare, then about 2 (TBV)	Owner as operator; Contractor as co-permittee	Before M2
W-02	Notice of termination after final stabilization (70 % perennial vegetative cover)	EPA Region 6 or	Termination form, photographs	1	Owner	M7
W-03	Hydrotest water source for about 7,000 gal (MEC-CAL-003) plus flushing: Water Resources Board provisional temporary permit, or purchase from a rural water district or municipal supply	or supplier	Source, volume, rate, dates, intake screening	2 to 4 (purchase about 1)	Contractor	2 weeks before M4
W-04	Hydrotest water disposal: preferably haul-off or land application without discharge to waters; discharge to waters needs permit coverage	, EPA Region 6 or (HOLD H-17)	Water analysis, volume, discharge point, energy dissipation	4 to 8	Contractor, Owner	1 week before M4

No.	Approval and trigger	Agency or party	Submittal content	Lead time, weeks	Responsible	Needed by
W-05	Clean Water Act Section 404 Nationwide Permit 12, only if fill is placed in waters of the United States; siting avoids waters, so it is not expected	US Army Corps of Engineers, District	Delineation, pre-construction notification, impacts	6 to 10	Owner	Before M2, if triggered
W-06	Spill Prevention, Control and Countermeasure plan, Tier I, self-certified, for 4,351 gal of aboveground oil storage (above the 1,320 gal threshold)	EPA (no submittal)	Plan completed from REG-RPT-004	2 to 4 to prepare	Owner	Before T-101 receives oil, M5
W-07	Registration or permit of the deep anode well for the impressed-current cathodic protection system, drilling by a licensed driller, and the well completion report (HOLD H-19)		Location, depth, casing and grout plan from CP-CAL-001 and CP-DWG-002; driller license	4 to 8 (TBV)	Cathodic protection contractor, Owner	Before drilling, between M3 and M4

3.4. SPECIES, CULTURAL RESOURCES AND LAND

Table 3-4 lists the species, cultural and land approvals. The American burying beetle evaluation carries the largest schedule uncertainty in the plan, because a presence survey can only be run during the beetle's active season.

Table 3-4: Species, Cultural and Land Approvals

No.	Approval and trigger	Agency or party	Submittal content	Lead time, weeks	Responsible	Needed by
E-01	Official species list and project review for any ground disturbance; also an input to stormwater eligibility	US Fish and Wildlife Service (USFWS), through the Information for Planning and Consultation (IPaC) system	Project area polygon and description	1 to 2	Owner's environmental consultant	2 weeks after M0

No.	Approval and trigger	Agency or party	Submittal content	Lead time, weeks	Responsible	Needed by
E-02	American burying beetle evaluation, if IPaC lists the species: presence survey in the active season (typically late May to late September, TBV) or an assumption of presence with the conservation measures of the species' 4(d) rule	USFWS	Habitat assessment and survey report, or a 4(d) compliance statement	4 to 26, seasonal	Owner's consultant	Before M2
E-03	Migratory bird nest clearance: clearing outside April 1 to July 15, or a nest survey within 5 days before clearing	USFWS (no permit)	Survey memorandum	1	Contractor's biologist	M2
E-04	Cultural resources records check; a Section 106 review only if there is a federal nexus such as a Corps permit	 Archeological Survey and State Historic Preservation Office	Records search request, map, description	2 to 4; 30 days if Section 106 applies	Owner's consultant	M2
E-05	Lease, access road easement and temporary workspace (HOLD H-03, H-05)	Landowner	Survey plats, compensation	8 to 16	Owner	Survey access at M0; recorded before M2

3.5. ROADS, TRANSPORT, UTILITIES AND COMMUNICATIONS

Table 3-5 lists the transport, utility and communications approvals. The electric service is the longest agency-side item: line extension engineering, easements and transformer supply commonly take 20 to 40 weeks.

Table 3-5: Road, Transport, Utility and Communications Approvals

No.	Approval and trigger	Agency or party	Submittal content	Lead time, weeks	Responsible	Needed by
T-01	Driveway connection permit and road use agreement on the section-line county road, with the ditch culvert (HOLD H-05)	County Commissioners	Access road design CIV-CAL-003, site plan CIV-DWG-002, culvert size, haul route, bond if required	2 to 6	Owner, Contractor	M2
T-02	Oversize and overweight permits: H-101 (about 34 ft x 9.5 ft, 45,324 lb), V-101 (29,529 lb), SK-110 (48 ft x 14 ft, 36,731 lb), weights per MEC-LST-002 (HOLD H-15)	Department of Transportation	Load dimensions and weights, route survey	1 to 2 per load	Carrier	M3
T-03	County oversize route approval and road condition survey	County	Route, bridge ratings	2 to 4	Carrier	M3
U-01	Electric service application, line extension and 75 kVA, 480Y/277 V transformer XF-101 (HOLD H-10)	Local electric cooperative	Load letter from ELE-CAL-001, one-line diagram ELE-DWG-001, site plan, easement	20 to 40	Owner	Energized before pre-commissioning, about M4

No.	Approval and trigger	Agency or party	Submittal content	Lead time, weeks	Responsible	Needed by
U-02	Locate tickets before every excavation, at least 48 hours ahead excluding weekends and holidays	OKIE811	Ticket with the area marked in white	48 hours, recurring	Contractor	Each excavation from M2
U-03	OKIE811 membership for the Owner's new buried facilities	OKIE811	Facility polygon	2 to 4	Owner	M5
C-01	Licence for the licensed 900 MHz SCADA radio path, or a satellite service agreement (HOLD H-14)	Federal Communications Commission, through a frequency coordinator	Frequency coordination, path study, antenna height	8 to 16	Owner	SCADA commissioning, M5

3.6. BUILDINGS, FIRE AND PRESSURE EQUIPMENT

Table 3-6 lists the building, fire and pressure equipment approvals.

Table 3-6: Building, Fire and Pressure Equipment Approvals

No.	Approval and trigger	Agency or party	Submittal content	Lead time, weeks	Responsible	Needed by
B-01	Plan review for prefabricated buildings B-101 and B-102, if required for the occupancy; no local building department is expected in the unincorporated county (HOLD H-11)	 State Fire Marshal; Uniform Building Code Commission	Building drawings, occupancy classification, fire protection, electrical	4 to 8	Owner, building vendor	Before building delivery, M3

No.	Approval and trigger	Agency or party	Submittal content	Lead time, weeks	Responsible	Needed by
B-02	Pressure vessel registration, or confirmation that pipeline pressure vessels are exempt (TBV), for V-101 (shop tested at 2,225 psig), the PR-101 barrel and the H-101 coil	[REDACTED] Department of Labor, Boiler and Pressure Vessel Safety	Manufacturer's data reports, National Board numbers	2 to 4	Owner	M5
B-03	Fire department liaison and emergency response pre-plan under 49 CFR 192.615	[REDACTED] County fire district and emergency management	Site plan, shutdown locations, contacts	2	Owner	M5

4. SCHEDULE AND CRITICAL PATH

Figure 4-1 shows the indicative permitting schedule against the construction milestones. Every approval can be in place by its need-by date if it is started when the figure shows. The schedule assumes permitting starts in winter, so that an American burying beetle survey window opens around weeks 17 to 20. If authorization comes after the active season has closed, the Owner will either take the assumption-of-presence route under the 4(d) rule or move clearing to the next season.

Figure 4-1. Indicative Permitting Schedule

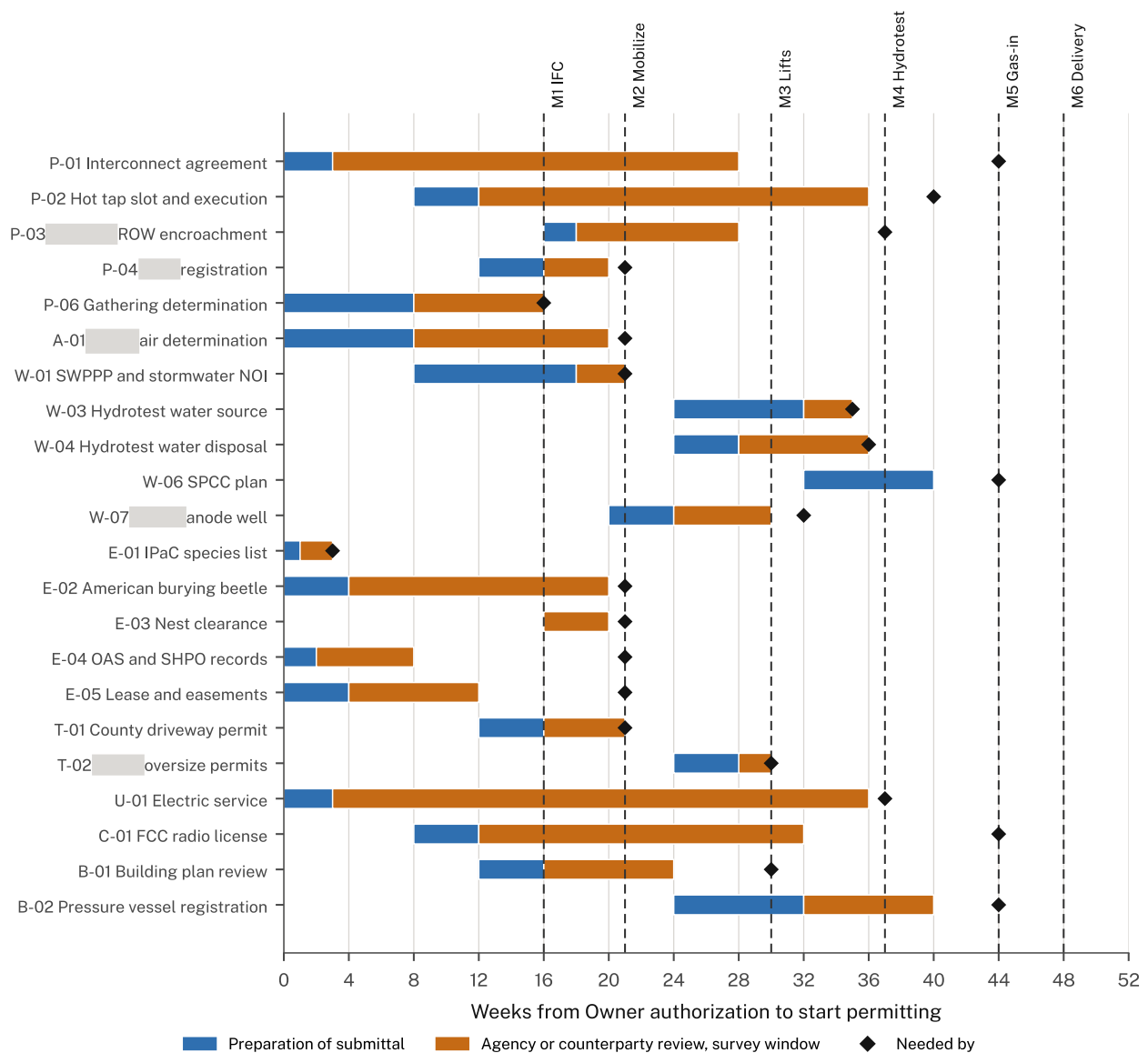


Table 4-1 ranks the approvals that can delay first earth disturbance or gas-in if they are not started at authorization.

Table 4-1: Critical Path Approvals

Rank	Approval	Why it is critical	Mitigation
1	P-01 and P-02, interconnect agreement and hot tap	Gas-in cannot occur without a signed agreement and a completed tap, and the receiving pipeline operator controls its crew schedule	Open discussions at authorization; submit the safety requirements specification and measurement design early; book the tap window at the construction issue
2	U-01, electric service	Line extension and transformer supply commonly run 20 to 40 weeks	Apply at authorization with a load letter; plan temporary power from G-101 and a rental generator for commissioning
3	E-02, American burying beetle	A missed active season can delay disturbance by months	Run IPaC in week 1; choose the survey or assumption-of-presence route by week 4; schedule clearing to suit
4	W-01, stormwater notice of intent	No earth disturbance until coverage is effective	Resolve the permitting authority (HOLD H-17) by week 4; the plan already satisfies both permits
5	A-01, air authorization	If registration is required before construction, it gates mobilization	File with REG-CAL-001, including the T-101 throughput limit
6	E-05, lease and easements	Needed for survey, geotechnical work and construction	Owner land action at authorization
7	P-06, pipeline classification (HOLD H-18)	A transmission classification brings rupture-mitigation valve and control room management evaluations that can change SCADA and procedures before gas-in	Obtain the upstream facility type and the receiving line's status by M1
8	W-07, deep anode well (HOLD H-19)	Cathodic protection must be energized within the period 49 CFR 192.455 allows, and drilling waits on registration	Confirm the requirement at authorization; file with the contractor's well design

5. FEDERAL AVIATION ADMINISTRATION NOTICE SCREEN

TORUS screened the site against the notice criteria of 14 CFR 77.9. A notice (FAA Form 7460-1) is required for a structure more than 200 ft above ground, or for one that penetrates a 100:1 surface within 20,000 ft of a public-use airport with a runway longer than 3,200 ft, or a 25:1 surface within 5,000 ft of a public-use heliport. The great-circle distance from the site (34.95 °N, 97.93 °W, HOLD H-02) to Municipal Airport (35.097 °N, 97.968 °W, TBV) is:

$$d = 2R \arcsin \sqrt{\sin^2 \frac{\Delta\phi}{2} + \cos \phi_1 \cos \phi_2 \sin^2 \frac{\Delta\lambda}{2}} = 54,800 \text{ ft}$$

with $R = 20,902,231$ ft. This is well outside the 20,000 ft radius. The tallest permanent structure is the 50 ft telecommunications mast near B-102; vent stack VS-101 is 25 ft; and the boom tip for the heaviest lift is below 80 ft (CON-CAL-001). All are below 200 ft. No notice is required, provided the site survey confirms that there is no closer public-use airport and no public-use heliport within 5,000 ft (open item RH-11).



6. APPROVALS NOT REQUIRED

Table 6-1 records the approvals that were considered and found not to be required, with the reason for each.

Table 6-1: Approvals Considered and Not Required

Approval	Reason	Record
FAA Form 7460-1	Outside the notice criteria of 14 CFR 77.9 (Section 5)	This report
Title V or Prevention of Significant Deterioration permit	Potential to emit far below 100 and 250 tons per year	REG-CAL-001
PHMSA construction notification, 49 CFR 191.22(c)	Required only for 10 miles or more of new pipeline or similar major projects; this project adds about 96 ft of lateral	REG-RPT-001
Facility Response Plan, 40 CFR 112.20	4,351 gal of oil storage, far below 42,000 gal and with no over-water transfer	REG-RPT-004
EPA Risk Management Program and OSHA Process Safety Management	Natural gas in a DOT-regulated pipeline facility; the station inventory of about 6,400 lb at maximum allowable operating pressure is also below 10,000 lb	REG-RPT-001
Corps of Engineers permit	Siting avoids waters	REG-RPT-003
Floodplain development permit	Site assumed in FEMA Zone X (HOLD H-09)	REG-RPT-003

7. CONCLUSIONS AND NEXT STEPS

Thirty-two approvals, agreements and notifications apply to the project. None needs a construction air permit, and none is expected to need a Corps of Engineers permit. Four items set the pace: the interconnect agreement and hot tap with the receiving pipeline operator, the electric cooperative service, the American burying beetle evaluation, and the stormwater notice of intent. Each can meet its need-by date only if it is started at the Owner's authorization.

TORUS recommends that the Owner take the following steps in the first four weeks: open the interconnect and hot tap discussions; apply for electric service; run IPaC and decide the American burying beetle route; resolve the stormwater and hydrotest water permitting authority (HOLD H-17) with the ; start the lease and easement work; and hold pre-application meetings with and to confirm the lead times in this report.

The open items are listed in Table 7-1. The project HOLDS H-01 to H-20 are defined in GEN-DB-001 and GEN-RPT-002; the regulatory open items RH-01 to RH-10 are defined in REG-RPT-001.

Table 7-1: Open Items Specific to This Report

Item	Description	Needed from
RH-11	Coordinates and runway lengths of the nearest public-use airport and heliport, for the FAA screen	Survey, Owner
RH-12	Agency pre-application confirmation of every lead time in this report	Owner's permitting lead
H-17	Stormwater and hydrotest discharge permitting authority	Owner, ,
H-18	Classification of the station and receiving line	Owner,
H-19	registration of the deep anode well	Cathodic protection contractor
H-20	V-101 liquids rate, which sets the T-101 limit	Owner's treating facility