Commonwealth of Kentucky
Division for Air Quality

STATEMENT OF BASIS / SUMMARY

Title V, Operating
Permit: V-25-032

Amcor Flexibles Healthcare Shelbyville
6850 Midland Industrial Drive
Shelbyville, Kentucky 40065

October 2, 2025
Qinyi Wang, Reviewer

SOURCE ID:	21-211-00054
AGENCY INTEREST:	107007
ACTIVITY:	APE20250001

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SECTION 1 – SOURCE DESCRIPTION

SIC Code and description: 2671, Packaging Paper and Plastics Film, Coated and Laminated (single-web and multi-web plastics packaging film and sheet)

Single Source Det. ☒ Yes ☐ No If Yes, Affiliated Source AI: 3950

Source-wide Limit ☒ Yes ☐ No If Yes, See Section 4, Table A

28 Source Category ☐ Yes ☒ No If Yes, Category:

County: Shelby
Nonattainment Area ☒ N/A ☐ PM_{10} ☐ $PM_{2.5}$ ☐ CO ☐ NO_X ☐ SO_2 ☐ Ozone ☐ Lead
If yes, list Classification: N/A

PTE* greater than 100 tpy for any criteria air pollutant ☒ Yes ☐ No
If yes, for what pollutant(s)?
☐ PM_{10} ☐ $PM_{2.5}$ ☐ CO ☐ NO_X ☐ SO_2 ☒ VOC

PTE* greater than 250 tpy for any criteria air pollutant ☒ Yes ☐ No
If yes, for what pollutant(s)?
☐ PM_{10} ☐ $PM_{2.5}$ ☐ CO ☐ NO_X ☐ SO_2 ☒ VOC

PTE* greater than 10 tpy for any single hazardous air pollutant (HAP) ☒ Yes ☐ No
If yes, list which pollutant(s): Ethyl Benzene, Toluene, Xylenes

PTE* greater than 25 tpy for combined HAP ☒ Yes ☐ No

*PTE does not include self-imposed emission limitations.

Description of Facility:
Amcor owns and operates a flexible packaging manufacturing facility.

SECTION 2 – CURRENT APPLICATION AND EMISSION SUMMARY FORM

Permit Number: V-25-032 Activities: APE20250001

Received: August 18, 2025 Application Complete Date(s): November 17, 2025

Permit Action: ☐ Initial ☒ Renewal ☐ Significant Rev ☐ Minor Rev ☐ Administrative

Construction/Modification Requested? ☐Yes ☒No NSR Applicable? ☐Yes ☒No

Previous 502(b)(10) or Off-Permit Changes incorporated with this permit action ☐Yes ☒No

Description of Action:
On August 18, 2025, an application was received from Amcor Flexibles, LLC for the renewal of their Title V permit (V-20-019) expiring on February 28, 2026 for their manufacturing facility in Shelbyville County , KY. There have been no changes to the Compliance Assurance Monitoring (CAM). No physical changes to process equipment or control devices.

- Solvent change in the Off-Line Parts Cleaning (EP 03).
- Bulk deliveries of MEK have been eliminated; N-propyl acetate is now stored in the 8000 gallon legacy MEK tank, which is listed in the permit (V-25-032) as an insignificant activity (IA08).
- The natural gas water heater listed as insignificant activity IA05 will be replaced with a 365,000 BTU unit.

V-25-032 Emission Summary				
Pollutant	2024 Actual (tpy)	Previous PTE V-20-019 (tpy)	Change (tpy)	Revised PTE V-25-032 (tpy)
CO	5.21	35.10	0	35.10
NO_X	6.21	41.78	0	41.78
PT	0.47	1.00	0	1.00
PM_{10}	0.47	1.00	0	1.00
$PM_{2.5}$	0.47	0.88	0	0.88
SO_2	0.04	0.25	0	0.25
VOC	22.46	362.0	+19	381.0*
Lead	N/A	0	0	0
Greenhouse Gases (GHGs)				
Carbon Dioxide	7448.4	50,139	0	50,139
Methane	0.14	0.96	0	0.96
Nitrous Oxide	0.14	0.92	0	0.92
CO_2 Equivalent (CO_2e)	N/A	50,437	0	50,437
Hazardous Air Pollutants (HAPs)				
Dibutyl Phthalate	0.09	1.76	0	1.76
Ethyl Benzene	0.34	14.1	0	14.1*
Formaldehyde	0.02	0.88	0	0.88

Toluene	1.13	56.43	0	56.43*
Vinyl Acetate	0.15	2.65	0	2.65
Xylenes	1.4	69.66	0	69.66*
Combined HAPs:	3.13	145.9	0	145.9*

*Source requested a limitation of potential emissions to preclude 401 KAR 51:017 and major source status for HAP.

SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS

Emission Unit 01, B4 - Boiler

Pollutant	Emission Limit or Standard	Regulatory Basis for Emission Limit or Standard	Emission Factor Used and Basis	Compliance Method
PM	0.56 lb/MMBtu	401 KAR 59:015, Section 4(1)(c)	AP-42 Chapter 1.4.	Assumed based upon natural gas combustion
	20% Opacity	401 KAR 59:015, Section 4(2)	N/A	Assumed based upon natural gas combustion
SO_2	3.0 lbs/MMBtu	401 KAR 59:015, Section 5(1)	AP-42 Chapter 1.4.	Assumed based upon natural gas combustion

Initial Construction Date: *01/1994*

Process Description:
One natural gas fired hot water boiler, 3.5 MMBtu/hr.

Applicable Regulation:
401 KAR 59:015, *New Indirect Heat Exchangers*

State-Origin Requirements:
401 KAR 63:020, *Potentially hazardous matter or toxic substances*

Comments:
PM Emission Limit, 401 KAR 59:015 Section 4.(1)(a); 0.56 lb/MMBtu for sources with a total heat input capacity totaling 10 MMBtu/hr or less for all affected facilities at the source.

Sulfur Dioxide Emission Limit, 401 KAR 59:015 Section 5.(1)(a)1.; 3.0 lb/MMBtu for sources with a total heat input capacity totaling 10 MMBtu/hr or less for all affected facilities at the source combusting liquid and gaseous fuels.

Emission Unit 23, B7, B8 (Pharma Boiler #3) and B9 (Pharma Boiler #4) – Boilers and Emission Unit 24, B1 – Boiler				
Pollutant	**Emission Limit or Standard**	**Regulatory Basis for Emission Limit or Standard**	**Emission Factor Used and Basis**	**Compliance Method**
PM	0.45 lb/MMBtu (EP23) 0.44 lb/MMBtu (EP24)	401 KAR 59:015, Section 4(1)(c)	AP-42 Chapter 1.4.	Assumed based upon natural gas combustion
	20% opacity	401 KAR 59:015, Section 4(2)	N/A	Assumed based upon natural gas combustion
SO_2	2.1 lbs/MMBtu (EP23) 2.0 lbs/MMBtu (EP24)	401 KAR 59:015, Section 5(1)	AP-42 Chapter 1.4.	Assumed based upon natural gas combustion

Initial Construction Date: *EP23, 2008; EP24, 12/2016*

Process Description:
EP23 is 3 natural gas fired boilers, one 9.85 MMBtu/hr and two 5.5 MMBtu/hr.
EP24 is one 3.0 MMBtu/hr natural gas fired boiler.

Applicable Regulation:
401 KAR 59:015, *New Indirect Heat Exchangers*, applicable to indirect heat exchangers having a heat input capacity greater than one (1) million BTU per hour (MMBtu/hr) commenced on or after April 9, 1972 (401 KAR 59:015, Section 2(1)).

State-Origin Requirements:
401 KAR 63:020, *Potentially hazardous matter or toxic substances*

Comments:
Allowable emissions for the units are calculated using 401 KAR 59:015, Section 3(1) using the total rated heat input capacity of all affected facilities at a source. EP23 and 24 share emission limits.

EP23 emission limits:
PM Emission Limit, 401 KAR 59:015 Section 4.(1)(c); $0.45 = 0.9634 * (3.5 + 9.85 + 5.5 + 5.5)^{-0.2356}$
Sulfur Dioxide Emission Limit, 401 KAR 59:015 Section 5.(1)(c)2.; $2.1 = 7.7223 * (3.5 + 9.85 + 5.5 + 5.5)^{-0.4106}$

EP24 emission limits:
PM Emission Limit, 401 KAR 59:015 Section 4.(1)(c); $0.44 = 0.9634 * (3.5 + 9.85 + 5.5 + 5.5 + 3.0)^{-0.2356}$

Sulfur Dioxide Emission Limit, 401 KAR 59:015 Section 5.(1)(c)2.; $2.0 = 7.7223 * (3.5 + 9.85 + 5.5 + 5.5 + 3.0)^{-0.4106}$

Emission Unit 02 (EP02) Pharmaceutical Packaging - Storage and Mixing Areas				
Pollutant	**Emission Limit or Standard**	**Regulatory Basis for Emission Limit or Standard**	**Emission Factor Used and Basis**	**Compliance Method**
VOC	Less than 15% by weight of net VOC input shall be emitted	401 KAR 59:210	0.2% total VOC throughput, source testing	Management Practices
	Less than 35% by weight of net VOC input shall be emitted	401 KAR 59:212		

Initial Construction Date: *2005*

Process Description:
The storage and mixing areas are supporting facilities for the printing, coating and laminating activities.

Applicable Regulation:
401 KAR 59:210, *New fabric, vinyl and paper surface coating operations*
401 KAR 59:212, *New graphic arts facilities using rotogravure and flexography*

State-Origin Requirements:
401 KAR 63:020, *Potentially hazardous matter or toxic substances*

Comments:
No testing is required if the facility mixes in capped containers, stores of raw materials in closed containers, and uses closed vessels or piping to transfer raw materials for mixing and use. Emission factor for mixing and storage of inks, coatings, and solvents is 0.2% of VOC throughput (total VOC usage) when best management practices are utilized.

Emission Unit 03 (EP03) Off-Line Parts Cleaning				
Pollutant	**Emission Limit or Standard**	**Regulatory Basis for Emission Limit or Standard**	**Emission Factor Used and Basis**	**Compliance Method**
VOC	Less than 15% by weight of net VOC input shall be emitted	401 KAR 59:210	Material Balance & SDS	Monitoring and Recordkeeping Requirements
	Less than 35% by weight of net VOC input shall be emitted	401 KAR 59:212		

Initial Construction Date: *2005*

Process Description:
The cleaning is a support activity for the printing, coating and laminating.
One SWS400 Progressive Recovery parts washer (or equivalent) is utilized.

Applicable Regulation:
401 KAR 59:210, *New fabric, vinyl and paper surface coating operations*

401 KAR 59:212, *New graphic arts facilities using rotogravure and flexography*

Comments:
Engineering estimations are used to estimate the potential loss of solvent from the process.

The parts washer used as part of press, coater, and laminator cleaning is not subject to 401 KAR 59:185. This determination has been made based on the design of the parts washers and on the content of page 2-4 of the CTG source document that is the basis for 401 KAR 59:185 (EPA-450/2-77-022 Control of Volatile Organic Emissions from Solvent Metal Cleaning). The parts washer used at Amcor Flexibles, LLC does not fit the description of cold cleaner, open top vapor degreaser or conveyorized degreaser. The parts washer has some characteristics of each of these types of metal solvent cleaning equipment, but cold cleaners have a tank of solvent with a work surface or basket suspended over the solvent.

Emission Units 13, 18, and 19 Rotogravure Printers				
Pollutant	**Emission Limit or Standard**	**Regulatory Basis for Emission Limit or Standard**	**Emission Factor Used and Basis**	**Compliance Method**
VOC	Less than 35% by weight of net VOC input shall be emitted	401 KAR 59:212	Material Balance & SDS	Regenerative Thermal Oxidizers (RTO) #3, #8, #10 Testing, 100% Capture 99.12%, 98.38% and 97.17% DRE

Initial Construction Date : EP13:1994, EP18: 01/2015, EP19: 09/2001

Process Description:
EP13, P5
EP13 is an 8 station 35.5 inch wide printing rotogravure printing press.
8 ovens rated at a total of 10 MM Btu/hr combined. The ovens utilize hot oil that recovers heat generated in control device #3.
Control Devices: Oxidizers #3, #8, and #10

EP18, P9
EP18 is a 10 station 47.25 inch wide rotogravure printing press with a laminator.
10 natural gas fired ovens rated at a total of 6.6 MM Btu/hr combined.
Control Devices: Oxidizers #3, #8, and #10

EP19, P10
EP19 is a 4 station 27.5 inch wide rotogravure printing press.
6 natural gas fired ovens rated at a total of 9.0 MM Btu/hr combined.
Control Devices: Oxidizers #3, #8, and #10

Each printer is within a permanent total enclosure. The initial test of the PTE was conducted in 2011 and used EPA Method 204.

Applicable Regulation:
401 KAR 59:212, *New graphic arts facilities using rotogravure and flexography*
40 CFR Part 64, *Compliance Assurance Monitoring for VOC*

State-Origin Requirements:
401 KAR 63:020, *Potentially hazardous matter or toxic substances*

Comments:
To preclude major source status for HAP emissions, the source has agreed to an emission limit of 4.5 tons per year single HAP and 11.25 tons per year combined HAP. [To preclude 40 CFR 63 Subpart KK and Subpart JJJJ]

401 KAR 59:210 Section 4(5) requires 24 hour VOC averaging to determine compliance with the regulation's emission limits. A SIP revision was submitted and accepted to extend this to a 30-day averaging period. See the July 10, 2003 Federal Register. The same averaging period is used to determine 59:212 compliance. (68 FR 41083, https://www.federalregister.gov/documents/2003/07/10/03-17510/approval-and-promulgation-of-implementation-plans-for-kentucky-source-specific-revision-for-lawson).

Emission Units 12, 14, and 16 Laminating Lines				
Pollutant	**Emission Limit or Standard**	**Regulatory Basis for Emission Limit or Standard**	**Emission Factor Used and Basis**	**Compliance Method**
VOC	Less than 15% by weight of net VOC input shall be emitted	401 KAR 59:210	Material Balance & SDS	Regenerative Thermal Oxidizers (RTO) #3, #8, #10 Testing, 100% Capture 99.12%, 98.38% and 97.17% DRE

Initial Construction Date: EP12: 1994, EP14: 2000, EP16: 05/2008

Process Description:
EP12, L4
EP12 is a 2 station 35.5 inch wide Laminator
2 natural gas ovens rated at a total of 5.0 MM Btu/hr combined.
Control Devices: Oxidizers #3, #8, and #10

EP14, L5
EP14 is a 2 station 47 inch wide Laminator
2 natural gas ovens rated at a total of 11.0 MM Btu/hr combined.
Control Devices: Oxidizers #3, #8, and #10

EP16, L7
EP16 is a 3 station 47 inch wide laminator and coater
3 natural gas ovens rated at a total of 6.6 MM Btu/hr combined.
Control Devices: Oxidizers #3, #8, and #10

Each Laminator is within a permanent total enclosure. The initial test of the PTE was conducted in 2011 and used EPA Method 204.

Applicable Regulation:
401 KAR 59:210, *New fabric, vinyl and paper surface coating operations*
40 CFR Part 64, *Compliance Assurance Monitoring*

State-Origin Requirements:
401 KAR 63:020, *Potentially hazardous matter or toxic substances*

Comments:
To preclude major source status for HAP emissions, the source has agreed to an emission limit of 4.5 tons per year single HAP and 11.25 tons per year combined HAP. [To preclude 40 CFR 63, Subpart KK and 40 CFR 63, Subpart JJJJ]

401 KAR 59:210 Section 4(5) requires 24 hour VOC averaging to determine compliance with the regulation's emission limits. A SIP revision was submitted and accepted to extend this to a 30-day averaging period. See the July 10, 2003 Federal Register. (68 FR 41083)

SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS (CONTINUED)

Testing Requirements\Results

Emission Unit(s)	Control Device	Parameter	Regulatory Basis	Frequency	Test Method	Permit Limit	Test Result	Thruput and Operating Parameter(s) Established During Test	Activity Graybar	Date of last Compliance Testing
EP # 12,13, 14, 16, 18 and 19	RTO #10	VOC DRE	401 KAR 59:212 and 401 KAR 59:210	Initial and every 5 years	Method 25A	35% by weight of VOC input (59:212) and 15% by weight of VOC input (59:210)	98.8% under high load, 97.83 low VOC load	Combustion Temperature 1594°F	CMN2011 0002	4/1/2011
EP # 12,13, 14, 16, 18 and 19		VOC Capture	401 KAR 59:212 and 401 KAR 59:210	Initial	Method 204	N/A	100%	N/A	CMN2011 0002	4/1/2011
EP # 12,13, 14, 16, 18 and 19	RTO #3, 8, 10	VOC DRE	401 KAR 59:212 and 401 KAR 59:210	every 5 years	Method 25A	35% by weight of VOC input (59:212) and 15% by weight of VOC input (59:210)	RTO 3, 99.07%; RTO 8, 99.12%; RTO 10, 99.11% DRE	Combustion Temperature RTO 3 1593°F RTO 8, 1596°F; RTO 10, 1590°F	CMN2014 0001	3/25/2014
EP # 12,13, 14, 16, 18 and 19	RTO #3, 8, 10	VOC DRE	401 KAR 59:212 and 401 KAR 59:210	every 5 years	Method 25A	35% by weight of VOC input (59:212) and 15% by weight of VOC input (59:210)	RTO 3, 98.71%; RTO 8, 99.21%; RTO 10, 98.72% DRE	Combustion Temperature RTO 3, 1595°F; RTO 8, 1593°F; RTO 10, 1598°F	CMN2017 0001	4/12/2017
EP # 12,13, 14, 16, 18 and 19	RTO #3, 8, 10	VOC DRE	401 KAR 59:212 and 401 KAR 59:210	every 5 years	Method 25A	35% by weight of VOC input (59:212) and 15% by weight of VOC input (59:210)	RTO 3, 99.12%; RTO 8, 98.38%; RTO 10, 97.17% DRE	Combustion Temperature RTO 3, 1595°F; RTO 8, 1584°F; RTO 10, 1601°F	CMN2022 0001	3/8/2022

Footnotes:

SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS

Table A - Group Requirements:

Emission and Operating Limit	Regulation	Emission Unit
230 tpy of VOC emissions	To preclude the applicability of 401 KAR 51:017, *Prevention of significant deterioration of air quality*	Source-wide
4.5 tpy of individual HAP emissions	To preclude major source status for HAP	Source-wide
11.25 tpy of combined HAP emissions	To preclude major source status for HAP	Source-wide

Table B - Summary of Applicable Regulations:

Applicable Regulations	Emission Unit
401 KAR 59:005, *General provisions*	EP01, 23, 24
401 KAR 59:015, *New Indirect Heat Exchangers*	EP01, 23, 24
401 KAR 59:210, *New fabric, vinyl and paper surface coating operations*	EP02, 03, 12, 14, 16
401 KAR 59:212, *New graphic arts facilities using rotogravure and flexography*	EP02, 03, 13, 18, 19
401 KAR 63:020, *Potentially hazardous matter or toxic substances*	EP02, 12, 13, 14, 16, 18, 19
40 CFR Part 64, *Compliance Assurance Monitoring*	EP12, 13, 14, 16, 18, 19

Table C - Summary of Precluded Regulations:

Precluded Regulations	Emission Unit
401 KAR 51:017, *Prevention of significant deterioration of air quality*	Source-wide

SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS (CONTINUED)

Table D - Summary of Non Applicable Regulations:

Non Applicable Regulations	Emission Unit
N/A	

Air Toxic Analysis

401 KAR 63:020, *Potentially Hazardous Matter or Toxic Substances*
The Division for Air Quality (Division) has performed modeling using SCREEN View on November 13, 2025 of potentially hazardous matter or toxic substances (Dibutyl Phthalate, Ethyl Benzene, Formaldehyde, Toluene, Xylenes, Methylene Diphenyl Diisocyanate, Methyl Ethyl Ketone, Ethyl Acetate, 1-Methoxy-2-Propanol, Acetone, Vinyl Acetate, Glutaraldehyde, Diethylene Glycol Monobutyl Ether, Diethylene Glycol Monoethyl Ether, Cumene, Phthalic Anhydride, 1,6-Hexamethylene Diisocyanate) that may be emitted by the facility based upon the process rates, material formulations, stack heights and other pertinent information provided by the applicant. Based upon this information, the Division has determined that the conditions outlined in this permit will assure compliance with the requirements of 401 KAR 63:020.

Single Source Determination
Amcor Flexibles, LLC, ID # 21-211-00054, Permit # V-25-032 (AI 107007), and Bemis Packaging Inc., ID # 21-211-00031, Permit # V-23-024 (AI 3950), are considered by the Kentucky Division for Air Quality to be "single source" in determining applicability under 401 KAR 51:017, Prevention of Significant Deterioration (PSD) of air quality and subject to 401 KAR 52:020, Title V Permits. Each facility is responsible and liable for their own violations unless there is a joint cause for the violations.

SECTION 5 – COMPLIANCE ASSURANCE MONITORING

40 CFR 64, *Compliance assurance monitoring* (CAM) applies to a pollutant-specific emissions unit at a major source that is required to obtain a part 70 or 71 permit if the unit satisfies all of the following criteria:

(1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), other than an emission limitation or standard that is exempt under 40 CFR 64.2(b)(1);

(2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and

(3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source.

Emission Unit	Criteria 1 (Y/N)	Criteria 2 (Y/N)	Criteria 3 (Y/N)	Does CAM apply? If Y for criteria 1, 2, AND 3, then Yes, Otherwise, No.
EP01	Y	N	N	No
EP02	Y	N	N	No
EP03	Y	N	N	No
EP13	Y	Y	Y	Yes
EP18	Y	Y	Y	Yes
EP19	Y	Y	Y	Yes
EP12	Y	Y	Y	Yes
EP14	Y	Y	Y	Yes
EP16	Y	Y	Y	Yes
EP23	Y	N	N	No
EP24	Y	N	N	No

* If Yes, CAM applies for any of the emission units above, then see further clarification for each listed emission unit in **Section 3**.

SECTION 6 – PERMITTING HISTORY

Permit	Permit Type	Activity #	Complete Date	Issuance Date	Summary of Action	PSD/Syn Minor
V-10-015	Initial	APE20100002	5/12/2010	10/4/2010	Construction / Operating Permit	Syn Minor
V-15-026	Renewal	APE20150001	5/28/2015	1/4/2016	Renewal	N/A
V-15-026 R1	Minor Revision	APE20170001	6/7/2017	9/24/2017	Removal of P5 and P9 simultaneous operation restriction and boiler replacement	N/A
V-20-019	Renewal	APE20200002	8/18/2020	2/28/2021	Renewal Permit	N/A

SECTION 7 – PERMIT APPLICATION HISTORY

None

APPENDIX A – ABBREVIATIONS AND ACRONYMS

AAQS – Ambient Air Quality Standards
BACT – Best Available Control Technology
Btu – British thermal unit
CAM – Compliance Assurance Monitoring
CO – Carbon Monoxide
Division – Kentucky Division for Air Quality
ESP – Electrostatic Precipitator
GHG – Greenhouse Gas
HAP – Hazardous Air Pollutant
HF – Hydrogen Fluoride (Gaseous)
MSDS – Material Safety Data Sheets
mmHg – Millimeter of mercury column height
NAAQS – National Ambient Air Quality Standards
NESHAP – National Emissions Standards for Hazardous Air Pollutants
NO_x – Nitrogen Oxides
NSR – New Source Review
PM – Particulate Matter
PM_{10} – Particulate Matter equal to or smaller than 10 micrometers
$PM_{2.5}$ – Particulate Matter equal to or smaller than 2.5 micrometers
PSD – Prevention of Significant Deterioration
PTE – Potential to Emit
SO_2 – Sulfur Dioxide
TF – Total Fluoride (Particulate & Gaseous)
VOC – Volatile Organic Compounds

APPENDIX B – INDIRECT HEAT EXCHANGER EMISSIONS LIMITATIONS

EU	Fuel	Capacity (MMBtu/hr)	Construction Date	Notes/ Removal Date	Basis for PM Limit	Total Heat Input Capacity for PM Limit (MMBtu/hr)	Basis for SO_2 Limit	Total Heat Input Capacity for SO_2 Limit (MMBtu/hr)
EP01	Natural Gas	3.5	1994	N/A	Section 4(1)(a)	3.5	Section 5(1)(a)1.	3.5
EP23	Natural Gas	20.85 total	2008	N/A	Section 4(1)(c)	24.35	Section 5(1)(c)2.	24.35
EP24	Natural Gas	3.0	2016	N/A	Section 4(1)(c)	27.35	Section 5(1)(c)2.	27.35