

Transwestern Pipeline Company, LLC
Operational Guidelines for Receipt of Renewable Natural Gas from RNG Receipt Points
(April 8, 2024 Version)

GENERAL

Pursuant to Section 2 of the General Terms and Conditions of Transwestern Pipeline Company, LLC's ("Transwestern") Federal Energy Regulatory Commission NGA Gas Tariff ("FERC Gas Tariff"), the gas stream into Transwestern's pipeline system by Shipper or Shipper's designee at receipt points shall conform to certain quality standards. In particular, GT&C Section 2 states that such gas:

- "shall be commercially free from objectionable odors, solid matter, dust, gums and gum forming constituents, or any other substance which interferes with the intended purpose or Merchantability¹ of the gas, or causes interference with the proper and safe operation of the lines, meters, regulators, or other appliances through which it may flow" (GT&C Section 2.1.A)
- "shall not contain any toxic or hazardous substance in concentrations which, in the normal use of gas, may be hazardous to health, injurious to pipeline facilities, or be a limit to Merchantability or be contrary to applicable government standards" (GT&C Section 2.1.J)

Accordingly, the following operational guidelines ("Guidelines") provide actions required for the acceptance of Renewable Natural Gas ("RNG")² into Transwestern's system at receipt points ("RNG Receipt Points") and the actions required when RNG receipts ("Receipt Gas") exceed constituent permissible limits, listed in the table below, that would render the gas unmerchantable, cause injury or interference with facilities, be hazardous to health or otherwise not be conformance with the FERC Gas Tariff.

Transwestern shall evaluate the receipt of RNG at RNG Receipt Points on a case by case basis, considering the pipeline operating conditions at and downstream of the receipt location, such as, but not limited to, (i) the prevention of any potentially adverse impact to, or unsafe operating conditions on, Transwestern or any Shipper's facilities downstream of the RNG Receipt Point, and (ii) the avoidance of any requirement to modify any existing environmental or other permits such as, without limitation, those required to operate Transwestern's compression facilities.

¹ For purposes of these Guidelines, "Merchantability" refers to a gas stream which is commercially salable and fit for the market, and of a quality which will bring the then current market price without additional treatment or processing.

² For purposes of these Guidelines, "Renewable Natural Gas" or "RNG" shall mean a portion of Biogas that has been processed in order to be deliverable into Transwestern's system to meet Transwestern's gas quality standards and specifications and not exceed applicable constituent permissible limits. Sources may include non-hazardous landfill gas, animal waste from livestock/poultry farms, dairies, feedlots, publicly-owned treatment works, sewage treatment plants, or waste water plants.

RNG may come from a variety of sources, including but not limited to: (i) landfills, excluding Hazardous Waste Landfills as defined below, (ii) animal waste from livestock/poultry, farms, dairies and feedlots (collectively, “Organic Biomass”) and (iii) publicly-owned treatment works, sewage treatment plants, or waste water plants (collectively, “POTW”). The following constituents to be tested are as follows and are dependent upon the source of the Receipt Gas:

Constituent	Permissible Limits mg/m ³ (PPMv)	Landfill/ POTW	Organic Biomass	Testing Methods†
Alkyl Thiols (Mercaptans)	(610)	Periodic	Periodic	ASTM D6228
Ammonia	7 (10)	Periodic	Periodic	NIOSH 3800
Antimony	30 (6.1)	Periodic	*	NIOSH 7303
Arsenic	0.48 (0.15)	Periodic	*	NIOSH 7303
Copper	3 (1.2)	Periodic	*	NIOSH 7303
Ethyl benzene	650 (150)	Periodic	Periodic	EPA TO-14A, TO-15
Hydrogen	0.1% (1000)	Periodic	Periodic	ASTM D1945
Lead	3.8 (0.44)	Periodic	*	NIOSH 7303
Mercury	0.08 (0.0094)	Periodic	*	NIOSH 6009
Methacrolein	53 (18)	Periodic	*	EPA TO-15
n-Nitroso-di-n-propylamine	0.81 (0.15)	Periodic	Periodic	EPA 3542, 8270
p-Dichlorobenzene	140 (24)	Periodic	*	EPA TO-14A, TO-15
Microbiological Organisms (APB, SRB, IOB)	100 colonies/ml liquid	Periodic	Periodic	API-RP38, EPA Method 5
Siloxanes	0.1 mg Si / m ³	Continuous	*	ASTM D8230, ASTM D8455
Toluene	45,000 (12,000)	Periodic	Periodic	EPA TO-14A, TO-15
Vinyl Chloride	21 (8.3)	Periodic	*	EPA TO-14A, TO-15

‡ Alternate Testing Methods may be used if deemed by mutual agreement between Transwestern and RNG Operator, to be equivalent to the above listed methods.

*For Receipt Gas sourced from Organic Biomass, these constituents will not be tested for unless additional testing is requested by Transwestern per below.

Receipt Gas to be delivered to and transported on Transwestern's pipeline system by RNG Operator shall be subject to periodic testing and continuous monitoring based on the source of the Receipt Gas. The testing procedures outlined below may be revised as required and as necessary, and as determined by Transwestern in its sole discretion, to meet the requirements of such applicable laws, regulations or legal authority, and public health and safety obligations as promulgated by governmental authorities having jurisdiction, including, without limitation, the Pipeline Hazardous Materials Safety Administration and the Occupational Safety and Health Administration.

RNG Operator and Transwestern shall undertake the testing procedures set forth herein to ensure that Receipt Gas to be received by Transwestern is merchantable, will not cause injury or interference with facilities or be hazardous to health and otherwise meets the gas quality standards contained in the FERC Gas Tariff.

Transwestern may, in its sole discretion and on a not unduly discriminatory basis, immediately shut-in all Receipt Gas if any test results do not comply with the gas quality standards contained in the FERC Gas Tariff or if the Receipt Gas does not meet the constituent permissible limits set out above.

Testing by RNG Operator shall be performed to assess whether the Receipt Gas conforms to gas quality limits and the constituent permissible limits using two methods: lab testing or onsite analysis. Both methods shall be utilized during Pre-Injection Testing and Periodic Testing, as these terms are defined below. Onsite analysis shall be utilized during Continuous Sampling.

RNG Operator and Transwestern shall reasonably agree upon one or more independent, certified third-party lab(s) ("Approved Laboratory") and testing protocols that the RNG Operator shall employ for sampling and lab testing. Except as provided below, the costs associated with Pre-Injection Testing, Periodic Testing, and if applicable, Continuous Sampling by RNG Operator; and any required retesting or expedited testing, are the sole responsibility of RNG Operator.

Transwestern shall be notified three (3) business days in advance of the Receipt Gas sampling for lab testing and have the option to observe the samples being taken. Test results shall be shared with Transwestern within five (5) calendar days of the test results being received by RNG Operator. Receipt Gas shall not enter Transwestern's pipeline system until results have been verified and accepted by Transwestern, provided that Transwestern shall not unreasonably withhold, delay or condition such verification and acceptance.

Transwestern shall be notified three (3) business days in advance of any scheduled repair, maintenance, verification, or calibration of Continuous Sampling analyzers and have the option to observe. In the

event of unscheduled repair, maintenance, verification, or calibration, Transwestern shall be notified as soon as possible and have the option to observe and/or assess the ability to adequately monitor the quality of the Receipt Gas.

Transwestern, in its sole judgement, may request additional testing at any time with reasonable advance notice if Transwestern has a concern with the quality of the Receipt Gas or the sampling results within thirty (30) calendar days after receipt of the initial test results. The cost of such testing shall be borne by RNG Operator if such testing demonstrates that any contaminant exists in concentrations above acceptable limits. If, after such testing, the contaminants are determined to exist in concentrations below acceptable limits, then the cost of the testing shall be borne by Transwestern.

RNG Operator shall notify Transwestern within ten (10) business days if there is a change in design or operational facilities that impacts the source, size of, composition or volume of gas from the facility generating the Receipt Gas. When such changes occur, the Receipt Gas shall be treated as a new source and all constituents must be reconfirmed.

Upon request, Transwestern shall have the right to share all test results of the Receipt Gas to third parties.

Transwestern prohibits the delivery of RNG to Transwestern from any landfill permitted under the Resource Conservation and Recovery Act Subtitle C (42 U.S.C. § 6921 – 6932), whether by the United States Environmental Protection Agency or a state under a program authorized by the United States Environmental Protection Agency (“Hazardous Waste Landfills”). RNG Operator³ shall not knowingly supply or cause to be supplied RNG from a Hazardous Waste Landfill. It is the responsibility of RNG Operator to disclose whether the landfill providing Receipt Gas is a Hazardous Waste Landfill, has ever been a Hazardous Waste Landfill, or, to the best of RNG Operator’s knowledge formed after using all reasonable due diligence, has ever accepted material that would require permitting as a Hazardous Waste Landfill. A Hazardous Waste Landfill includes all continuous land and structures, and other appurtenances and improvements, on the land used for the treatment, transfer, storage, resource recovery, and disposal or recycling of hazardous waste. RNG Operator delivering Receipt Gas into Transwestern’s system shall certify in writing to Transwestern that the Receipt Gas is not being produced from landfill gas collected from a Hazardous Waste Landfill before delivering the Receipt Gas into Transwestern’s pipeline system. In addition, RNG Operator shall demonstrate verification from an approved company that the Receipt Gas does not originate from a Hazardous Waste Landfill before gas flows into Transwestern’s pipeline system.

RNG Operator with any source of Receipt Gas from a non-hazardous landfill is required to provide documentation in the form of an environmental due diligence assessment prior to the execution of an interconnect agreement. The cost of the assessment is to be paid by the RNG Operator.

³ For purposes of these Guidelines, “RNG Operator” shall mean anyone producing RNG delivered into Transwestern’s pipeline system or operating a Receipt Point capable of delivering RNG into Transwestern’s pipeline system.

1. Testing Procedures – Organic Biomass

a. Pre-Injection Testing

RNG Operator shall extract one (1) sample for lab testing and Transwestern shall confirm the test results are within the permissible limits in the constituent table above for that RNG source prior to the receipt of RNG into Transwestern's pipeline system. The sample shall be extracted within forty-five (45) calendar days prior to planned initial flow in Transwestern's pipeline system.

If during Pre-Injection Testing, there are any results exceeding the applicable constituent permissible limits, the RNG will not be received into Transwestern's pipeline system. RNG Operator shall make necessary modifications and, after review of such modifications by Transwestern, may request a restart of Pre-Injection Testing.

If satisfactory test results are within Transwestern's applicable constituent permissible limits, then RNG may be received into Transwestern's pipeline system.

b. Periodic Testing

Once Receipt Gas is allowed to be received into Transwestern's pipeline system and absent a waiver provided by Transwestern in its sole discretion and on a not unduly discriminatory basis, RNG Operator is required to perform the required periodic testing outlined below (i.e., Monthly Testing, Quarterly Testing and Annual Testing) in order for the Receipt Gas to continue to be received into Transwestern's pipeline system. RNG Operator shall procure and furnish all materials, equipment, supplies, services and labor required for Periodic Testing extractions and analysis.

Receipt Gas samples shall be extracted for laboratory analysis at a sample point upstream of the RNG Receipt Point. The sample point shall be an inline probe and shall be separate from the sample point used for Continuous Sampling. Samples shall be collected by RNG Operator using Transwestern approved industry standard testing methods. With regards to sampling, the methods, apparatus, collection devices, expiration times and chain of custody procedures shall conform to the applicable industry standards and laboratory requirements. Samples shall be sent by RNG Operator to the Approved Laboratory for analysis. As stated above, all test results will be shared with Transwestern within five (5) calendar days of the test results being received by RNG Operator. RNG Operator shall be responsible for all costs associated with such testing (excluding Transwestern's discretionary testing as provided for above).

i. Monthly Testing

Following successful Pre-Injection Testing, RNG Operator shall conduct Monthly Testing (which consists of one (1) lab test every calendar month, not to exceed forty-five (45) calendar days between tests) to confirm that the constituents are at or below the permissible limits applicable to the Receipt Gas source, as stated in the table of constituents set out above. The first Monthly

Test shall be completed no later than thirty (30) calendar days after the successful completion date of the Pre-Injection Testing.

If all the test results do not exceed the applicable constituent permissible limits during the first Monthly Test, RNG Operator will transition to Quarterly Testing.

Transwestern may, in its sole discretion and on a not unduly discriminatory basis, waive some or all of the requirements in the Monthly Testing procedure.

ii. Quarterly Testing

Following successful Pre-Injection Testing and Monthly Testing as outlined above, RNG Operator shall conduct Quarterly Testing (which consists of one (1) lab test in every third calendar month, not to exceed one hundred five (105) calendar days between tests) to confirm that the constituents are at or below the permissible limits applicable to the Receipt Gas source, as stated in the table of constituents set out above. The first Quarterly Test shall be completed no later than ninety (90) calendar days after the date of the last successful Monthly Test.

If all test results are do not exceed the applicable constituent permissible limits during Quarterly Testing for three (3) consecutive tests, Transwestern shall review RNG Operator's operational history (including, but not limited to, consistent, reliable and stable operations, stable analyzer readings, etc.) for all previous test results to determine whether RNG Operator may transition from Quarterly Testing to Annual Testing. If Transwestern consents to RNG Operator transitioning from Quarterly Testing to Annual Testing (such consent to be made on a not unduly discriminatory basis), RNG Operator shall transition to Annual Testing. If Transwestern withholds consent to RNG Operator to transition from Quarterly Testing to Annual Testing after test results are within the applicable constituent permissible limits during Quarterly Testing for three (3) consecutive tests, Transwestern shall provide RNG Operator with a detailed written explanation of the reason(s) consent was withheld. Absent Transwestern's consent, RNG Operator shall remain on a Quarterly Testing timeline with one (1) lab test in every third calendar month, not to exceed one hundred five (105) calendar days between tests.

Transwestern may, in its sole discretion and on a not unduly discriminatory basis, waive some or all of the requirements in the Quarterly Testing procedure.

iii. Annual Testing

If RNG Operator transitions to Annual Testing following Transwestern's consent, RNG Operator shall conduct one (1) lab test per calendar year, not to exceed thirteen (13) months between tests, to confirm that the constituents do not exceed the permissible limits applicable to the Receipt Gas source, as stated in the table of constituents set out above. The first Annual Test shall be completed

no later than three hundred sixty-five (365) calendar days after the date of the last successful Quarterly Test.

Transwestern may, in its sole discretion and on a not unduly discriminatory basis, waive some or all of the requirements in the Annual Testing procedure.

In the event of unsuccessful test results during any of the Periodic Testing – Monthly, Quarterly, or Annual – testing shall revert back to Monthly Testing.

c. Continuous Sampling

Unless otherwise agreed upon, Transwestern shall own, operate and provide maintenance of the gas quality equipment required for custody transfer measurement, and RNG Operator shall own, operate and provide maintenance for all additional required analyzers for Continuous Sampling if required. All equipment utilized for Continuous Sampling shall be approved by Transwestern. Signals from the Continuous Sampling analyzers shall be provided to Transwestern for monitoring of the Receipt Gas. Selection of which constituents and the method/equipment types used for Continuous Sampling shall be made on a case by case basis primarily depending on the constituent concentrations encountered. Transwestern may require Periodic Testing for constituents shown in the constituent table set out above even if the constituents are continuously monitored.

If, during Continuous Sampling, results are found to not comply with the FERC Gas Tariff's gas quality limits or exceed the applicable constituent permissible limits during successive tests, Transwestern shall notify RNG Operator to conform with such operating parameters or to submit to Transwestern a plan of action to conform with such operating parameters that is acceptable to Transwestern in its sole discretion. Transwestern retains the right to refuse to accept any deliveries of natural gas not meeting any of the said requirements or operating procedures. In the event a station shut-in is required by Transwestern, the RNG supply will remain shut-in until RNG Operator has made necessary modifications and/or Transwestern has conducted an assessment of the impacted pipe segment to determine the appropriate response.

Transwestern may, in its sole discretion and on a not unduly discriminatory basis, waive some or all of the requirements in the Continuous Sampling procedure.

2. Testing Procedures - Landfill/POTW

a. Pre-Injection Testing

RNG Operator shall extract two (2) samples for lab testing and Transwestern shall confirm the test results are within the permissible limits in the constituent table above for that RNG source prior to the receipt of RNG into Transwestern's pipeline system. The first sample shall be extracted within forty-five (45) calendar days prior to planned initial flow in Transwestern's pipeline system. The second sample shall be extracted after acceptable test results of the first sample are received and with adequate days to receive the second test results prior to initial flow into Transwestern's pipeline system.

If during Pre-Injection Testing, there are any results exceeding the applicable constituent permissible limits, the RNG will not be received into Transwestern's pipeline system. RNG Operator shall make necessary modifications and, after review of such modifications by Transwestern, may request a restart of Pre-Injection Testing.

If both test results are within Transwestern's applicable constituent permissible limits, then RNG may be received into Transwestern's pipeline system.

b. Periodic Testing

Once Receipt Gas is allowed to be received into Transwestern's pipeline system and absent a waiver provided by Transwestern in its sole discretion and on a not unduly discriminatory basis, RNG Operator is required to perform the required periodic testing outlined below (i.e., Monthly Testing, Quarterly Testing and Annual Testing) in order for the Receipt Gas to continue to be received into Transwestern's pipeline system. RNG Operator shall procure and furnish all materials, equipment, supplies, services and labor required for Periodic Testing extractions and analysis.

Receipt Gas samples shall be extracted for laboratory analysis at a sample point upstream of the RNG Receipt Point. The sample point shall be an inline probe and shall be separate from the sample point used for Continuous Sampling. Samples shall be collected by RNG Operator using Transwestern approved industry standard testing methods. With regards to sampling, the methods, apparatus, collection devices, expiration times and chain of custody procedures shall conform to the applicable industry standards and laboratory requirements. Samples shall be sent by RNG Operator to the Approved Laboratory for analysis. As stated above, all test results will be shared with Transwestern within five (5) calendar days of the test results being received by RNG Operator. RNG Operator shall be responsible for all costs associated with such testing (excluding Transwestern's discretionary testing as provided for above).

i. Monthly Testing

Following successful Pre-Injection Testing, RNG Operator shall conduct Monthly Testing (which consists of one (1) lab test every calendar month, not to exceed forty-five (45) calendar days between tests) to confirm that the constituents are at or below the permissible limits applicable to the Receipt Gas source, as stated in the table of constituents set out above. The first Monthly Test shall be completed no later than thirty (30) calendar days after the successful completion date of the Pre-Injection Testing.

If all the test results do not exceed the applicable constituent permissible limits during Monthly Testing for three (3) consecutive tests, RNG Operator will transition to Quarterly Testing.

Transwestern may, in its sole discretion and on a not unduly discriminatory basis, waive some or all of the requirements in the Monthly Testing procedure.

ii. Quarterly Testing

Following successful Pre-Injection Testing and Monthly Testing as outlined above, RNG Operator shall conduct Quarterly Testing (which consists of one (1) lab test in every third calendar month, not to exceed one hundred five (105) calendar days between tests) to confirm that the constituents are at or below the permissible limits applicable to the Receipt Gas source, as stated in the table of constituents set out above. The first Quarterly Test shall be completed no later than ninety (90) calendar days after the date of the last successful Monthly Test.

If all test results do not exceed the applicable constituent permissible limits during Quarterly Testing for three (3) consecutive tests, Transwestern shall review RNG Operator's operational history (including, but not limited to, consistent, reliable and stable operations, stable analyzer readings, etc.) for all previous test results to determine whether RNG Operator may transition from Quarterly Testing to Annual Testing. If Transwestern consents to RNG Operator transitioning from Quarterly Testing to Annual Testing (such consent to be made on a not unduly discriminatory basis), RNG Operator shall transition to Annual Testing. If Transwestern withholds consent to RNG Operator transitioning from Quarterly Testing to Annual testing after test results are within the applicable constituent permissible limits during Quarterly Testing for three (3) consecutive tests, Transwestern shall provide RNG

Operator with a detailed written explanation of the reason(s) consent was withheld. Absent Transwestern's consent, RNG Operator shall remain on a Quarterly Testing timeline with one (1) lab test in every third calendar month, not to exceed one hundred five (105) calendar days between tests.

Transwestern may, in its sole discretion and on a not unduly discriminatory basis, waive some or all of the requirements in the Quarterly Testing procedure.

iii. Annual Testing

If RNG Operator transitions to Annual Testing following Transwestern's consent, RNG Operator shall conduct one (1) lab test per calendar year, not to exceed thirteen (13) months between tests, to confirm that the constituents do not exceed the permissible limits applicable to the Receipt Gas source, as stated in the table of constituents set out above. The first Annual Test shall be completed no later than three hundred sixty-five (365) calendar days after the date of the last successful Quarterly Test.

Transwestern may, in its sole discretion and on a not unduly discriminatory basis, waive some or all of the requirements in the Annual Testing procedure.

In the event of unsuccessful test results during any of the Periodic Testing – Monthly, Quarterly, or Annual – testing shall revert back to Monthly Testing.

c. Continuous Sampling

Unless otherwise agreed upon, Transwestern shall own, operate and provide maintenance of the gas quality equipment required for custody transfer measurement, and RNG Operator shall own, operate and provide maintenance for all additional required analyzers for Continuous Sampling. All equipment utilized for Continuous Sampling shall be approved by Transwestern. Signals from the Continuous Sampling analyzers shall be provided to Transwestern for monitoring of the Receipt Gas. Selection of which constituents and the method/equipment types used for Continuous Sampling shall be made on a case-by-case basis primarily depending on the constituent concentrations encountered. Transwestern may require Periodic Testing for constituents shown in the constituent table set out above even if the constituents are continuously monitored.

If, during Continuous Sampling, results are found to not comply with the FERC Gas Tariff's gas quality limits or exceed the applicable constituent permissible limits during successive tests, Transwestern shall notify RNG Operator to conform with such operating parameters or to submit to Transwestern a plan of action to conform with such operating parameters that is acceptable to Transwestern in its sole discretion. Transwestern retains the right to refuse to accept any deliveries of natural gas not meeting any of the said requirements or operating procedures. In

the event a station shut-in is required by Transwestern, the RNG supply will remain shut-in until RNG Operator has made necessary modifications and/or Transwestern has conducted an assessment of the impacted pipe segment to determine the appropriate response.

Transwestern may, in its sole discretion and on a not unduly discriminatory basis, waive some or all of the requirements in the Continuous Sampling procedure.

Miscellaneous

- Transwestern may, in its sole discretion exercised on a not unduly discriminatory basis, waive some or all of the constituent permissible limits specified in the table set out above.
- Transwestern may revise these Guidelines from time to time at its sole discretion.
- The following is a link to the latest version of these Guidelines set out in Transwestern's website: **[insert such link to Transwestern's informational postings]**
- These Guidelines will be incorporated by reference in the Interconnect and Operating Agreement and related documents.