



REGION 8

DENVER, CO 80202

**XTO Energy, Inc. – Various Well Pads
Located on North Dakota State Land
Partial Compliance Evaluation (PCE)
On-Site Clean Air Act (CAA) Inspections**

Inspection Date(s): October 22, 2024

Inspection Report Date: December 27, 2024

US EPA Region 8 Katelyn Bergl, Clean Air Act Inspector
Representatives: Youn Joo Kim, Clean Air Act Inspector
Taylor Waanders, Clean Air Act Inspector

North Dakota Division of Russel Martin, Inspector
Air Quality Representatives: Myles Erb, Inspector

Company Representatives: None

Inspection Report Prepared Katelyn Bergl
By: Youn Joo Kim

Inspection Report Reviewed Scott Patefield, Manager, Enforcement and Compliance
By: Assurance Division, Air and Toxics Enforcement Branch

Applicable Rules: North Dakota Administrative Code, Title 33.1, Article 15, as incorporated into North Dakota's EPA-approved State Implementation Plan at 40 C.F.R. Part 52, Subpart JJ – North Dakota (ND SIP), including the following chapters:

- Chapter 7, Control of Organic Compound Emissions (ND SIP Chapter 7);
- Chapter 12, Standards of Performance for New Stationary Sources (ND SIP Chapter 12); and
- Chapter 20, Control of Emissions from Oil and Gas Well Production Facilities (ND SIP Chapter 20)

40 C.F.R. Part 60, Subpart OOOO – Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification, or Reconstruction Commenced After August 23, 2011, and on or Before September 18, 2015

40 C.F.R Part 60, Subpart OOOOa – Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 (NSPS OOOOa)

40 C.F.R Part 60, Subpart OOOOb – Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification or Reconstruction Commenced After December 6, 2022 (NSPS OOOOb)

Compliance Assistance

None

Enforcement History

XTO Energy, Inc. (XTO) was issued a Notice of Violation (NOV) on August 28, 2024, under Docket Number CAA-08-2024-0015.

Areas of Concern

None

General Inspection Information

Unannounced well pad inspections were conducted jointly by U.S. EPA and North Dakota Department of Environmental Quality – Division of Air Quality inspectors (Inspectors) on October 22, 2024, at multiple XTO facilities located in North Dakota. XTO is a wholly-owned subsidiary of Exxon Mobil that operates under the XTO Energy name.

The Inspectors evaluated each well site listed in Table 1 using audio, visual, and olfactory (AVO) inspection methods including the use of an optical gas imaging (OGI) camera and EPA Reference Method 22. At each facility, Inspectors scanned the crude and/or water storage tanks, closed vent system and flares onsite for any detectable emissions. Specifically, Inspectors scanned storage tank covers and closed vent systems for hydrocarbon emissions to determine compliance with the Clean Air Act, including the North Dakota SIP and NSPS regulations.

Each well pad inspection followed the approach below:

1. Record the entry sign of the well pad when available. Survey the entire well pad with OGI camera.
2. Record the number and type of site process equipment such as well heads, tanks, and emission control devices.
3. Record AVO indications of emissions from the storage tanks, closed vent system to the control devices and control devices.
4. Using the OGI camera, survey each process in infrared modes (auto, manual, and/or high-sensitivity modes). Record any uncontrolled emissions with the OGI camera and describe the frequency and magnitude of emissions in the field notebook.

5. Observe control devices (enclosed combustor or utility flare) for visible emissions. If there is visible emissions present, conduct Method 22 and record the observations.
6. Using another OGI camera, if available, confirm any observations of uncontrolled emissions with another Inspector.
7. If there are operators present onsite, share any Areas of Concern.

Table 1 lists general inspection and well pad details for each inspected well pad. The well pad information located in Table 1 is from the North Dakota Industrial Commission (NDIC) well index located online at <https://www.dmr.nd.gov/oilgas/>.

Table 1: Inspection and Facility Details of Facilities Inspected						
Date	Arrival Time	Departure Time	Well Pad Name	API Number(s)	Latitude	Longitude
10/22/24	9:25	9:33	Loomer 41X-3C	3305304933 3305304932 3305304931 3305304930	47.847506	-103.32861
10/22/24	9:34	9:40	Rita 44X-34BXC	3305306841 3305306754 3305306305 3305306304 3305306303 3305306302 3305306753	47.848366	-103.33167

Tables 2 and 3 summarize inspection observations. Table 2 summarizes storage tank observations. Table 3 includes details of control devices and related observations. See Appendix A for a log of images and videos taken during the inspections.

Table 2: Inspection Details: Storage Tank Observations				
Well Pad Name	Number of Storage Tanks	AVO (Audio, visual, olfactory) Observations	Emissions Description	Media File Name
Loomer 41X-3C	20	—	—	—
Rita 44X-34BXC	30	—	—	—

Table 3: Inspection Details: Control Devices and AVO/OGI Observations						
Well Name	Number of Control Device(s)	Control Device Type(s)	Visible Pilot Flame (Y/N)	Active Flaring (Y/N)	Method 22 Observations	Emission Description
Loomer 41X-3C	2	High-Low	Y	N	None	—
		2-Prong HP	Y	N	None	—
Rita 44X-34BXC	3	Air Assisted Steffes	Y	N	None	—
		Air Assisted Steffes	Y	N	None	—
		2-Prong HP	Y	N	None	—

APPENDIX A: Photograph and Video Log

Media File	Description	Well Pad Name
entrysign-20241022-142650.jpg	Entry Sign	Loomer 41X-3C
entrysign-20241022-143550.jpg	Entry Sign	Rita 44X-34BXC