



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

DATE: JUN 05 2019

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Utica Resource Operating, LLC – Detweiler Well Pad, Salesville, Ohio

FROM: Natalie Topinka, Environmental Scientist
AECAB (IL/IN)

THRU: Nathan Frank, Section Chief
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: Utica Resource Operating, LLC – Detweiler Well Pad

Facility Location: 39.988577, -81.386899, Salesville, Ohio

Date of Inspection: April 18, 2019

EPA Inspectors:

1. Natalie Topinka, Environmental Scientist
2. Victoria Nelson, Environmental Engineer
3. Constantinos Loukeris, Environmental Engineer

Other Attendees:

1. Maureen Kertes, EHS Professional, URO
2. Shannon Thompson, KC Harvey
3. Kevin Rothenbuhler, VP of Operations, URO

Contact Email Address: mkertes@uticaresource.com

Purpose of Inspection: To assess compliance with NSPS Subpart OOOO and the facility's PTIO

Facility Type: oil and natural gas well pad

Regulations Central to Inspection: NSPS Subpart OOOO

Arrival Time: 10:07 am

Departure Time: 10:45 am

Inspection Type:

- ☐ Unannounced Inspection
- ☒ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Ms. Kertes unless otherwise noted.

Company Ownership: This well pad, along with 10 others in Ohio, was constructed and formerly owned and operated by PDC Energy. Utica Resource Operating, LLC acquired the facilities in early 2018.

Process Description:

At the well pad, an oil/gas/water emulsion is extracted from the formation through two wells. The emulsion from each well goes to a separator, from which the gas is sent to the sales line and the oil and water are piped to separate 400-barrel, atmospheric pressure, fixed-roof tanks on-site. The vapors from the tank headspaces are piped together and to a combustor for destruction. Each tank has a "thief" hatch on top for gaining access to the liquid when necessary. The thief hatches are set to relieve pressure should the pressure due to flashing, working, or breathing emissions from the liquids contained within the tanks get too high for the piping of the vapor capture system and combustor to accommodate.

Staff Interview: Mr. Rothenbuhler stated that URO had to replace the temperature controllers frequently due to leaks.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

The Detweiler pad has eight tanks and three vapor recovery towers (VRT). It was unclear if the VRTs were operating or otherwise in service. We climbed the tank battery and observed the thief hatches and pressure relief devices. We noted a hydrocarbon odor on the catwalk and observed emissions from thief hatches, which increased in intensity and volume during dump events to the tanks. We observed a sticky paraffin build-up as well as liquid condensate droplets around several of the thief hatches. We recorded numerous FLIR videos of emissions from thief hatches and confirmed the presence of volatile organic compounds (VOC) in the emissions plume using a Photo Ionization Detector (PID). We observed emissions via the FLIR camera from

temperature controllers and equipment related to the two separators. The combustor was operating at the time of the inspection.

Photos and/or Videos: were taken during the inspection.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

Compliance Assistance: We shared what we observed with the FLIR camera with URO representatives.

Concerns: We had concerns about design and operation of the vapor capture and control systems at the facilities, which we discussed with URO representatives. We also discussed the concern that because these facilities were acquired from another company and much of the operations are currently contracted out, there appears to be a lack of historical information and knowledge about how the facilities were constructed and are currently operated.

SIGNATURES

Report Author: Natalie Tri Date: 5/28/19
Section Chief: Matthew GTR Date: 6/5/19

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APPENDICES AND ATTACHMENTS

1. Digital image/video log
2. Digital images and videos on CD

Facility Name: Utica Resource Operating, LLC -- Detweiler Well Pad

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APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Natalie Topinka	2. Date(s) of Inspection: April 18, 2019
3. Company/Facility Name: Utica Resource Operating, LLC -- Detweiler Well Pad	4. Street Address, City, State: 39.988577, -81.386899, Salesville, Ohio
5. Number of Images: 22	6. Archival Record Location: CD-R labeled "Utica Resource Operating, LLC -- Detweiler well pad -- Inspection photos 4/18/19"

Image Number	File Name	Date and time	Latitude and Longitude	Description of Image
1	P4180019.JPG	4/18/2019 10:15 EDT	40.043056, -81.382778	Thief hatch with condensate droplets & staining
2	P4180020.JPG	4/18/2019 10:15 EDT	40.043056, -81.382778	Thief hatch with condensate droplets, paraffin build-up, & staining
3	P4180021.JPG	4/18/2019 10:19 EDT	39.989167, -81.386667	Thief hatch with condensate droplets, paraffin build-up, & staining
4	P4180022.JPG	4/18/2019 10:23 EDT	39.989398, -81.386673	Thief hatch with condensate droplets
5	MOV_2334.mp4	4/18/2019		Emissions from thief hatches viewed from ground level
6	MOV_2335.mp4	4/18/2019		Emissions from thief hatch
7	MOV_2336.mp4	4/18/2019		Emissions from thief hatch
8	MOV_2337.mp4	4/18/2019		Emissions from thief hatch
9	MOV_2338.mp4	4/18/2019		Emissions from thief hatch

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10	MOV_2339.mp4	4/18/2019	Emissions from thief hatch
11	MOV_2340.mp4	4/18/2019	Emissions from thief hatch
12	MOV_2341.mp4	4/18/2019	Emissions from thief hatch
13	MOV_2342.mp4	4/18/2019	Emissions from thief hatch
14	MOV_2343.mp4	4/18/2019	Emissions from thief hatch
15	MOV_2344.mp4	4/18/2019	Emissions from LP separator #1 enclosure vent
16	MOV_2345.mp4	4/18/2019	Emissions from temperature controller inside LP separator #1 enclosure
17	MOV_2346.mp4	4/18/2019	Emissions from other controllers inside LP separator #1 enclosure
18	MOV_2347.mp4	4/18/2019	Combustor stack
19	MOV_2348.mp4	4/18/2019	Emissions from LP separator #2 enclosure vent
20	MOV_2349.mp4	4/18/2019	Emissions from piping at LP separator #2 enclosure
21	MOV_2350.mp4	4/18/2019	Intermittent emissions from 4/18/2019LP separator #2 enclosure vent
22	MOV_2351.mp4	4/18/2019	Emissions from leak point in LP separator #2 enclosure