



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Air Act Inspection of Jay-Bee Oil and Gas
Inspection Date(s): 10/1/2024 – 10/2/2024
Regulatory Program(s): SIP, NSPS, NESHAP
Company Name: Same as below
Facility Name: Jay-Bee Oil and Gas
Facility Location: Multiple locations – see in report
Latitude: 39.21594 **Longitude:** -81.1591
County/Parish: Tyler and Doddridge Counties
AFS/ICIS-Air Number: 110059233707, among others
Permit Number: WV00009500027, among others
NAICS Code: 211111 **SIC:** 1311
DSB ID #: ECAD-5678

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I. Introduction

The United States Environmental Protection Agency (EPA) conducted a Clean Air Act (CAA) inspection at Jay-Bee Oil and Gas (Jay-Bee or Facility) to verify compliance with applicable State and Federal regulations. The West Virginia Department of Environmental Protection (WVDEP) was notified of the inspection on September 17, 2024, via email. On September 26, 2024, EPA notified the Facility of the planned inspection via phone and email. EPA emailed a list of records for review to Justin Whipkey, prior to the inspection (see Attachment 1). These records are listed in the Records Review section of the report.

The inspection included an evaluation of the Facility's processes and its compliance with the CAA. All information included in this report is the result of statements by the Facility representatives, materials shown to the inspectors by the Facility representatives, and/or documents provided by the Facility representatives to the inspectors at the time of, or subsequent to, the inspection. In addition, information gathered prior to the inspection from a review of EPA and State records may be included in Section A. Summary of the Facility.

A. Summary of the Facility

The eight inspected facilities are located in Tyler and Doddridge counties in West Virginia. Jay-Bee is a full-service oil and gas company that is engaged in nearly all phases of well development from the initial preparation of the site to reclamation including the daily operation and maintenance of producing wells. Jay-Bee is a family-owned business which has been in operation for forty years. They operate under the 211111 NAICS code for Crude Petroleum and Natural Gas Extraction.

Below is the permitting information for the eight inspected facilities.

Facility Name	WV Permit Number	Issue Date
Larry Well Pad	G70-D215A	2017-01-17
Ti-03 Well Pad	G70-D049B	2023-02-21
Gorby Well Pad	G70-D128C	2024-06-24
Maddie Mae Well Pad	G70-D149B	2023-10-11
Big Moses Compressor Station	G35-D102C	2024-01-22
Dopey Well Pad	G70-D210C	2023-09-18
Doc Well Pad	G70-D148C	2024-06-24
Grumpy Well Pad	G70-D138D	2024-05-30

At least one of the inspected facilities is subject to, or potentially subject to the following federal regulations:

- 40 CFR Part 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

- 40 CFR 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, and on or Before December 6, 2022
- 40 CFR 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
- 40 CFR Part 63 Subpart HH – National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities
- 40 CFR Part 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

B. Inspection Opening Conference

At 3:18 PM on October 1, 2024, EPA inspectors arrived at Jay-Bee's Bridgeport office for a brief opening conference before conducting a CAA Inspection at their facilities starting on October 2, 2024. Jay-Bee was represented by Justin Whipkey, Production Manager, Danny Aman, Field Agent, and Emily Potesta, Regulatory Agent. Also, Bronwyn Harrison, Environmental Inspector (WVDEP) was present. EPA inspectors, Dean DeLuca and Scott Yanos, presented their credentials and explained the purpose of the visit was to conduct a CAA inspection to determine compliance with their permits and any applicable regulations. EPA informed Jay-Bee they would be taking photographs and using a FLIR (Forward Looking InfraRed) GFx320 camera. Additionally, EPA informed the facility representatives of their right to claim any confidential business information (CBI). At that time, Jay-Bee did not claim any photos or documentation as CBI.

II. Site Activity/Process Description

Jay-Bee has been a family-owned business since the company started in 1982. The company started by drilling vertical wells and then stopped vertical wells and started drilling horizontal wells around 2007 or 2008. Jay-Bee drills wells in both the Marcellus and Utica formations after starting in the Utica formation around 2017 or 2018. Jay-Bee also currently has nine privately-owned subsidiary LLCs (limited liability corporations) under the Jay-Bee Oil and Gas umbrella which operate in specific portions of the business. Jay-Bee employs approximately 125 full-time employees, including the subsidiary LLCs.

Jay-Bee operates over 500 wells, all of which are gas wells and some of which are oil and gas wells. Of these 500 wells, 100-120 are horizontal unconventional wells located on twenty-four well pads, with the remainder of the wells being conventional vertical wells. Jay-Bee currently operates three compressor stations, one of which is going to be removed from service. Jay-Bee also is going to be starting two new compressor stations, likely by the end of the year. After the operational changes, Jay-Bee will have four operating compressor stations. Jay-Bee has, or will have, three different types of air

permits issued by the WVDEP: R13, G70, and G35. The Facility stated they do not have any central tank batteries, do not have any sweetener units, and do not have any sour gas that contains hydrogen sulfide.

The Facility stated they own their own water trucks but contract the condensate trucks to remove liquid from their sites. They remotely monitor many parameters including flows, temperatures, tank levels, on/off equipment, and gas flow line pressures and this information can be viewed by all necessary personnel. Tank pressure monitoring is not currently able to be viewed remotely, but that is scheduled to begin in October 2024 with the target to have all tanks with remote monitoring by the end of 2024. Currently, this data is being monitored locally.

Well pads are scheduled to be inspected two times every day. Field personnel shifts are twelve hours from 6 AM-6 PM or 6 PM-6AM so the pads are inspected once per shift. Jay-Bee stated they have a hard-wired feed for some of their operations which allows an alarm to be sent to personnel remotely in less than one minute. In this case, personnel should be on the pad in less than one hour. If remote monitoring indicates a non-alarm issue, personnel will typically be sent to the pad sooner, but at latest the pad will be observed during the next shift's inspection.

Jay-Bee stated they conduct daily AVO (audio, visual, olfactory) checks. The Facility also stated they conduct monthly FLIR monitoring inspections for LDAR (leak detection and repair). Jay-Bee stated the following conditions will cause a well or well pad to be automatically shut-in: pressure exceedances in the lines, tank level exceedances, loss of communications for a certain duration, fire, or electrical outage. The Facility stated they have air-driven pneumatic controllers in all locations.

Jay-Bee leases all the VRUs (vapor recovery units) used at their well pads through third parties and the units are generally all the same size. VRU's are used to recover vapors from the tanks and route them back to the process. They also lease the natural gas compressor engines and don't have any compressors using other fuels. Jay-Bee owns some gathering wells, and they own the lines going from the wells to compressors. They have liquid storage for produced water and produced condensate. Jay-Bee also stated they contract out the emissions inventory submittals.

The Facility stated they sometimes will drill new additional wells years after the initial wells were drilled. When this occurs, the well pad may have to be reconfigured. Currently, Jay-Bee is redrilling two of their pads, Bashful and Sleepy. In addition, they re-drilled some pads in 2023. The Facility stated their Utica pads have less equipment since oil is not produced from this formation.

The opening conference concluded at 4:59 PM.

III. Observations

On October 2, 2024, EPA inspectors were led on a walkthrough of the Larry well pad and compressor at 9:08 AM by Justin Whipkey, production manager, and Danny Aman, field agent of Jay-Bee, and

Bronwyn Harrison (WVDEP) was also present for the walkthrough. EPA inspectors noted photos and FLIR (FLIR GFx320) photos and videos would be taken during the Facility walkthroughs (Attachments 2 and 3). At the beginning of the walkthrough, it was completely overcast with light rain, no wind, and a temperature slightly over 60°F.

The inspection team started by quickly observing the location of the four 400 bbl storage tanks, two of which were produced water and two of which were condensate and then proceeding to the 1020 kW (~1350hp) Cat 3516 compressor. At the time of the inspection, the compressor was not operating. The Facility stated the well pad was shut-in and all equipment was shut down earlier in the morning. Following the compressor, the inspection team observed the Cameron glycol dehydrator (rated at 40MMBtu/hr), heater/treater, and vapor recovery unit. The Facility stated they also had a steam burner at this location which was a modified and derated combustor. The heater/treater had a weep hole under the vent on the pressure relief valve which appears to have caused staining on the tank. Jay-Bee stated this was still a closed system and the staining could have been caused by rainwater dripping with some rust.

Slightly down the hill on the other side of the upper pad were the three CH10 HY-BON/EDI combustors with no observed manufactured year. At the time of the inspection, the temperature of the combustor was 155°F showing a tank pressure of 4.2 oz/sq. inch. Jay-Bee stated the combustors typically operate at a minimum of 800°F during normal operation. The Facility stated the valve controlling gas flow from the tanks to the combustor first opens when the tank pressure reaches 5 oz/sq. inch and the valve for the second combustor opens when the tank pressure reaches 6 oz/sq. inch, then the second burner turns off when the pressure decreases to 3 oz/sq. inch and the first burner turns off when the pressure decreases to 2 oz/sq. inch. The combustor is continually burning some natural gas at the pilot light when the unit is not combusting.

Following the combustors, the inspection team walked up the hill to the previously observed storage tanks. The storage tanks had Enardo thief hatches set to open at 12 oz/sq. inch and Protectoseals set to open at 14 oz/sq. inch. Following the storage tanks, the inspection team went to the lower portion of the pad and observed the five gas processing units (GPUs) and five wellheads. Jay-Bee stated this pad initially had two wells, and three of the wells were drilled at a later time.

The well pad was still shut-in when the inspection team left at 10:02 AM.

The inspection team next went to the TI-03 pad and arrived at 10:29 AM. This well pad consisted of eight GPUs, eight wells, a heater treater, a VRU, three sand traps, six 400 bbl tanks, three of which were produced water and three were condensate, and two combustors. The Facility stated the most recent wells at this pad were drilled in 2023 and that all pneumatic controllers are on instrument air. The inspection team first observed the GPUs, heater treater and VRU followed by the air supply compressor. The newer GPUs were operating in the 90°F-100°F range and the older GPUs were operating in the 75°F-85°F range. At the time of observation, the inlet pressure to the heater treater

was 45 psi with an outlet pressure of 300 psi. After which the inspection team observed the wells and sand traps.

On the way to storage tanks, the inspection team took a FLIR video of the combustor and observed potential hydrocarbon emissions. Each storage tank had a Protectoseal thief hatch and the tanks' manifold had an Enardo thief hatch. The Enardo was set to open at 12 oz/sq. inch. No leaks were observed on the storage tanks with the FLIR camera. After returning to ground level from the storage tanks, the inspection team went to the combustors and took FLIR videos and images of combustor operation. The two combustors were Cimarron Energy CH-10 combustors with a manufacture date of 2022. At the time of the inspection, only one of the two combustors was in operation and was fluctuating around 1145°F showing a tank pressure of 2.9 oz/sq. inch. Prior to leaving the site, two more FLIR images of the combustor were obtained.

The inspection team left the well pad at 11:24 AM.

The inspection team next went to the Gorby pad and arrived at 11:32 AM. This well pad consisted of six GPUs, six wells, a heater treater, a VRU, six 400 bbl tanks, three of which were produced water and three were condensate, and two combustors. The inspection team first observed the GPUs, heater treater and VRU. At the time of observation, the inlet pressure to the heater treater was 40 psi with an outlet pressure of 325 psi. Following these units, the inspection team went to the storage tanks. The inspection team observed a Protectoseal on each of the tanks. No emissions were observed from the storage tanks with the FLIR. After the storage tanks, the inspection team observed the combustors.

The well pad had two Cimarron Energy CH-10 combustors with a manufacture date of 2022. At the time of the inspection, one combustor was 125°F showing 1.1 oz/sq. inch pressure with the other at 90°F showing 1.4 oz/sq. inch pressure. These values indicate recent operation since the temperatures were higher than ambient and any temperature increase caused by a pilot light, but the combustors were not in operation at the time of the inspection.

The inspection team left this well pad at 12:01 PM.

The inspection team next went to the Maddie Mae pad and arrived at 12:15 PM. This well pad consisted of five GPUs, five wells, a heater treater, a VRU, four 400 bbl tanks, two of which were produced water and two were condensate, two sand traps, and two combustors. The Facility stated that three of the wells were previously drilled and two were more recently drilled. The inspection team first observed the wells and sand traps before going to the GPUs, heater treater, and VRU. The inspection team recorded a FLIR video of the VRU stack showing potential hydrocarbon emissions. At the time of observation, the inlet pressure to the heater treater was 48 psi with an outlet pressure of 320 psi. The inspection team next went to the combustors.

The well pad had two Cimarron Energy CH-10 combustors with a manufacture date of July 2023. At the time of observation, one combustor was 75°F showing 3.6 oz/sq. inch pressure with the other was 415°F showing 3.6 oz/sq. inch pressure with a decreasing temperature. The inspection team next

observed the storage tanks with a FLIR camera. Again, there were no emissions observed from with storage tanks using the FLIR camera. Each storage tank had a Protectoseal thief hatch set to open at 14 oz/sq. inch and an Enardo thief hatch on the manifold for all tanks which was set to open at 12 oz/sq. inch. There was no staining observed on any of the storage tanks. From the top of the tanks, the combustors and VRU were again observed with the FLIR, and images were taken on the FLIR.

While the storage tanks were being observed, one of the combustors turned back on. The inspection went back to the combustors and observed a temperature of 750°F that was decreasing. The Facility said that on well pads where the production is decreasing, the combustors typically only operate for a couple minutes at a time.

The inspection team left this well pad at 12:56 PM.

The inspection team next went to the Big Moses Compressor Station and arrived at 1:31 PM. This Station included four Caterpillar 3608 compressors, two glycol dehydrators, a combustor, three 210 bbl storage tanks, two of which were condensate and one was water, and a slug catcher which was operated by a separate company. Jay-Bee stated the original compressor was installed around 2013, but the other three have been installed within the last two years.

The Facility stated this was Jay-Bee's largest compressor station and that it receives products from five well pads. Jay-Bee stated they own the lines, the wells, and the station, but they lease the compressor from USA Compression and that USA Compression conducts all the maintenance and prepares the units for any testing. Jay-Bee stated they only handle the testing and scheduling for the compressors, for example, if there is a leak observed with the FLIR, they tell USA Compression to come fix it. At the time of the inspection, the flow was observed to be 68,990 MCF/day and Jay-Bee estimated it would increase to about 80,000 – 82,000 MCF/day when the RPT 8 well pad work was completed. Jay-Bee stated that EQT (used to be EQM) owns the natural gas lines after the compressors.

Following the discussion about the station's operations, the inspection team started by observing the compressors in the compressor building. At the time of observation, the compressors showed the below information:

Unit Number	Total Hours	Pressure In (Psig)	Pressure Out (Psig)	RPMs
2391	11,666.8	214	870	957
2646	55,883.6	207	850	970
2373	86,572.6	216	866	977
2392	81,453.7	230	852	959

All compressors were observed to be 2,370 Hp. Using the FLIR, the inspection team observed potential hydrocarbon emissions exiting the throw vents from units 2373 and 2392. FLIR images and videos of these vents were taken. The inspection team requested additional information on the maintenance of the compressors. As part of this discussion, Jay-Bee mentioned that USA Compression does the packing

replacements but could not recall whether they are part of a preventative maintenance program or if they are replaced at a set interval. The compressor engines exhausted behind the building and a FLIR video and image was taken over the top of the building.

Following the compressors, the inspection team then observed the glycol dehydrators and steam burners. One steam burner was a modified Cimarron Energy CH-10 combustor which, at the time of observation, was 1780°F showing 3.6 oz/sq. inch pressure and was manufactured in 2022. Jay-Bee stated that because of the high moisture, they put more gas into the gas stream to help it burn at a higher temperature and higher destruction efficiency. The inspection team also observed a 1,000-gallon TEG (tri ethylene glycol) tank in the area.

The inspection team then observed the storage tanks, and no emissions were observed using the FLIR camera or any evidence of staining of other markings indicative of past leaks on the tanks. After the tanks, the inspection team observed the combustor. When the team first arrived at the combustor it was 1020°F, and decreasing, and showing 3.4 oz/sq. inch pressure. Gas flow to the combustor restarted (excluding the consistent gas flow to the pilot) and then stopped when the pressure decreased to 2.0 oz/sq. inch at 2:29:05 PM. Without gas flow, the temperature then dropped to approximately 750°F until gas flow resumed at 2:30:02 PM. The temperature then rose to about 1070°F until gas flow stopped when the pressure again decreased to 2.0 oz/sq. inch at 2:31:10 PM. The temperature then decreased to about 780°F before gas flow to the combustor resumed at 2:32:07 PM.

The inspection team left this compressor station at 2:42 PM.

The inspection team next went to the Dopey well pad and arrived at 2:49 PM. This well pad consisted of nine GPUs, nine wells, a heater treater, a VRU, eight 210 bbl tanks, four of which were produced water and four were condensate, a glycol dehydrator, a compressor, a tank combustor, and a modified combustor for steam. The Facility stated this pad originally had two wells, and then later added seven additional wells.

The team first observed the GPUs followed by the heater/treater and VRU. After which the team observed the 500,000 BTU Exterran model SB20-14 dehydrator which was operating at 360°F. Following the dehydrator, the inspection team observed the storage tanks. One of the thief hatches was difficult to read due to rust but appeared to be an Enardo 2008 set to 12.0 oz/sq. inch pressure. The other five thief hatches were Protectoseals set to 14.0 oz/sq. inch pressure. The compressor was observed but was not in operation at the time of observation as an automatic shutdown happened approximately an hour before the inspection due to low suction.

The inspection team left this well pad at 3:15 PM.

The inspection team next went to the Doc pad and arrived at 3:22 PM. This well pad consisted of eight GPUs, nine wells (Facility stated that two of the older wells share a GPU), a heater treater, a VRU, six 400 bbl tanks, three of which were produced water and three were condensate, two combustors, and a dehydrator with a modified combustor.

The inspection team started by inspecting the GPUs before going to the dehydrator. At the time of observation, the dehydrator's modified combustor (500,000 BTU/hr Hy-Bon EDI CH-10) was operating at 950°F and showing 3.1 oz/sq. inch pressure and the heater/treater was operating at 130°F. After the heater/treater, the inspection team observed the 1380 H Caterpillar compressor. At 3:50 PM, the second battery for the FLIR ran out of power so the FLIR camera could no longer be used. The inspection team observed the storage tanks and did not observe any odors on top of the tanks. Each storage tank had a Protectoseal thief hatch. Lastly, the inspection team observed the two Cimarron Energy combustors. One of the combustors was from 2021 but a date could not be found on the other combustor. At the time of observations, one combustor was operating at 1135°F showing 2.8 oz/sq. inch pressure and the 2021 combustor was operating at 115°F showing 2.7 oz/sq. inch pressure. The Facility stated that Cimarron Energy was purchased by Hy-Bon EDI.

The inspection team left this well pad at 3:57 PM.

The final well pad observed by the inspection team was the Grumpy pad and the team arrived at 4:04 PM. This well pad consisted of nine GPUs, nine wells, a heater treater, a VRU, six 400 bbl tanks, three of which were produced water and three were condensate, two tank combustors, a compressor, and a dehydrator with a modified steam burning combustor. Shortly after arriving at the pad and taking a single picture, the camera battery ran out of power so the camera could no longer be used.

The inspection team first went to the storage tanks. The storage tanks had Protectoseal thief hatches, and no odor was observed at the top of the storage tanks. When the team observed the first combustor, it was operating at 585°F and dropping while showing 4.0 oz/sq. inch pressure. The second combustor was operating at 1160°F while showing 3.9 oz/sq. inch pressure and a nameplate was not observed on either of the two similar combustors. The inspection team next observed the heater/treater which was operating at 98°F. The inlet pressure to the heater treater was 50 psi with an outlet pressure of 318 psi.

Following the heater/treater and VRU, the inspection team observed the compressor. At the time of observation, the compressor had 300 psi of suction going into the unit and 577 psi out. The compressor was operating at 1149 RPM and showed total hours of 75,385.8 hours. The Facility stated the compressors located on the pads are also leased from USA Compression and, similar to the compressor station, USA Compression does all maintenance and repairs on the units. The compressor was a 1,380 hp Caterpillar which was manufactured in March 2012. After which, the team observed the 500,000 BTU dehydrator which was operating at 354°F and used TEG injection.

The walkthrough concluded at 4:30 PM.

IV. Records Review

EPA did not conduct a records review on-site. EPA inspectors reviewed documents requested in the September 26, 2024, email to Justin Whipkey (see Attachment 1) while off-site. Records were provided

slightly prior to the inspection by Emily Potesta. Below are the records requested and what was provided:

1. Map showing natural gas processing plants, well pads, compressor stations, and any central tank batteries (CTB) in the Doddridge and Tyler Counties in Northern WV.
 - a. Startup date for the above sources.

Facility provided the requested map and startup dates.

2. List of wells and API number at each wellpad.
 - a. Date each well began production.

Facility provided the requested API Numbers for each wellpad and the date that production started.

3. List of storage vessels at each wellpad or CTB
 - a. Date of construction of each vessel

Facility provided the requested list of storage tanks and the installation date.

4. List of any compressor engines, whether they are at a wellpad, CTB, or other location.

Facility provided the requested compressor engines and their location.

5. Monthly production of each wellpad for gas (MMscf) and oil/condensate (bbl) from 1/1/2023 - 8/31/24.

Facility provided the requested production data.

6. Provide a list of all sources from any above request which have changed ownership since January 1, 2020, if any, as well as the date ownership changed.

Facility stated the company's ownership changed between family members.

In addition, EPA requested the following records while onsite:

1. Examples of two of Jay-Bee's daily pad inspections from 7-20-2024 and 9-20-2024.
2. Jay-Bee's 2023 emissions inventory submittal.
3. The well drilling years for all pads where there were two different years in which new wells were drilled, unless previously provided.
4. The USA Compression maintenance records for the observed compressor engines from 1/1/2023 - present.
5. Image of the nameplate for the Dopey compressor or specifications if no nameplate is present, unless previously provided.

V. Closing Conference

After the Facility walkthrough, EPA inspectors, Justin Whipkey, Production Manager, Danny Aman, Field Agent, and Bronwyn Harrison, Environmental Inspector (WVDEP) had a brief closing conference to ask additional questions and discuss observations. The EPA inspectors noted that the investigation is on-going, and any areas of concern identified in the final report do not necessarily reflect a violation or deviation, rather, they are areas that will require further investigation. EPA also noted that they would

issue an inspection report within 60 days, with a copy to the State. Simultaneously, EPA will perform a detailed review of records and may have additional questions. The inspection concluded at 4:52 PM.

The following have been identified as potential issues during the inspection. They are issues that require either further investigation by EPA or additional information or explanation by Jay-Bee Oil and Gas.

- Hydrocarbon emissions were observed by the FLIR camera and are indicative of emissions entering the atmosphere and not being captured by a vapor control system. These emissions were potentially observed at: the TI-03 well pad combustors, the Maddie Mae well pad VRU, and the throw vents from compressors 2373 and 2392 at the Big Moses compressor station.
- Missing nameplate on the compressor located on the Dopey well pad so the inspection team could neither confirm compliance nor ensure the installed compressor matched the permitted compressor.

VI. List of Attachments

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|---------------|---|
| Attachment 1: | Email correspondence to Justin Whipkey of records requested to review during inspection |
| Attachment 2: | Photo Log |
| Attachment 3: | FLIR Photo Log |