



REGION 8

DENVER, CO 80202

WPX Energy Williston, Inc. – Various Well Pads and Facilities Partial Compliance Evaluation (PCE) On-Site Clean Air Act (CAA) Inspections

Inspection Date(s): October 23 and 24, 2024

Inspection Report Date: December 27, 2024

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

Tribal Representatives: Dwight Bruce, MHA Energy

Company Representatives: None

Inspection Report Prepared By: Katelyn Bergl, US EPA Region 8, Clean Air Act Inspector
Youn Joo Kim, US EPA Region 8, Clean Air Act Inspector

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

Applicable Rules: 40 C.F.R Part 49, Subpart K – Federal Implementation Plan for Oil and Natural Gas Well Production Facilities; Fort Berthold Indian Reservation (Mandan, Hidatsa and Arikara Nation), North Dakota (Fort Berthold FIP)

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)

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Compliance Assistance

None

Enforcement History

None

Areas of Concern

1. The EPA detected visible emissions from an operating utility flare at the following well pads:
 - FBIR Smith 11X-10A
 - Good Voice 34-27H
 - Young Bird 34-27HA

See Table 1 below for more details regarding inspected locations for all well pads and Table 2 for inspection observation details. A log of images and videos captured during the inspections is provided in Appendix A.

General Inspection Information

Unannounced well pad inspections were conducted jointly by U.S. EPA and Fort Berthold Indian Reservation (FBIR) Tribal inspectors on October 23, and 24, 2024, at multiple WPX Energy Williston, Inc (WPX) facilities located on the FBIR. WPX is a wholly-owned subsidiary of Devon Energy that operates under the WPX name.

The EPA 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 Fort Berthold FIP 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	Latitude	Longitude
10/23/2024	13:45	13:54	FBIR Guy Black Hawk 24X-27A	3302501262 3302502341 3302502342 3302502430 3302503902 3302503903 3302503904 3302503905 3305306684	47.690383	-102.43966
10/23/2024	14:36	14:45	FBIR Smith 11X-10A	3302501229 3302501823 3302501824 3302501825 3302504903 3302504904	47.745331	-102.44701
10/24/2024	10:49	10:54	Bird Bear 35-26HA	3305308782 3305308783 3305308784 3305308785 3305308786 3305308787	47.76439	-102.68467
10/24/2024	10:56	11:06	Good Voice 34-27H	3305305501 3305305502 3305305503 3305306491 3305306492 3305308424 3305308425	47.763435	-102.68952
10/24/2024	11:10	11:17	Young Bird 34-27HA	3305308482 3305308483 3305308484 3305308549	47.762023	-102.70385

Observations and Regulatory Applicability

Fort Berthold FIP, NSPS OOOO, and NSPS OOOOa regulations which are potentially relevant to the Areas of Concern observed during inspections are summarized in this section.

Table 2 at the end of this report summarizes details of control devices and related observations. See Appendix A for a log of images and videos taken during the inspections.

Fort Berthold FIP Applicability

Based on drilling information reported to the NDIC well index by WPX, the facilities listed in Table 1 were completed after the August 12, 2007, applicability date (per 40 C.F.R. § 49.4161) and are producing from the Bakken Pool (per 40 C.F.R § 49.4163(a)(1)) and are thus subject to the Fort Berthold FIP.

Utility Flare Requirements [§ 49.4165(c)]

Per § 49.4165(c)(6)(vii), “The owner or operator must ensure that each enclosed combustor and utility flare is operated with no visible smoke emissions.” Per 49.4166(g)(3) and EPA Reference Method 22, the EPA noted black smoke emissions at the FBIR Smith 11X-10A, Good Voice 34-27H, and Young Bird 34-27HA well pads. See Area of Concern #1 above.

NSPS OOOO Applicability

Based on well production information reported by WPX to the NDIC and the date of construction, reconstruction, or modification of the storage vessels, the EPA believes that storage vessels and associated emissions control equipment at the FBIR Smith 11X-10A well pad are potentially subject to requirements for storage vessel affected facilities in NSPS OOOO.

Control Device Requirements [§§ 60.5412(d)]

Per § 60.5412(d)(1)(iii), owners and operators must, “Operate the combustion control device with no visible emissions, except for periods not to exceed a total of 1 minute during any 15-minute period.” The EPA observed black smoke continuously for more than five minutes (per Method 22) at the FBIR Smith 11X-10A well pad. See Area of Concern #1 above.

NSPS OOOOa Applicability

Based on WPX’s NSPS OOOOa annual reporting, the EPA believes that storage vessels and associated emissions control equipment at the Good Voice 34-27H and Young Bird 34-27HA well pads are potentially subject to requirements for storage vessel affected facilities in NSPS OOOOa.

Control Device Requirements [§§ 60.5412a(d) and 60.5413a(e)]

Per § 60.5412a(d)(1)(iii), owners and operators must, “Operate the combustion control device with no visible emissions, except for periods not to exceed a total of 1 minute during any 15-minute period.” The EPA observed black smoke continuously for more than five minutes (per Method 22) at the Good Voice 34-27H and Young Bird 34-27HA well pads. See Area of Concern #1 above.

Table 2: Inspection Details: Control Devices and AVO/OGI Observations								
Well or Well Pad Name	Number of Control Device(s)	Control Device Type(s)	Visible Pilot Flame (Y/N)	Active Flaring (Y/N)	Method 22 Observations	Emission Observation Description	Media File Name	Slope to K/O Drum
FBIR Smith 11X-10A	1	High/Low	Y	Y	Yes	Continuous smoking from High/Low flare.	N/A	K/O line sloped towards KO drum
Good Voice 34-27H	2	High/Low	Y	Y	Yes	Continuous smoking from High/Low flare.	N/A	K/O line sloped towards KO drum
		High Capacity	Y	N	None			
Young Bird 34-27HA	2	High/Low	Y	Y	Yes	Continuous smoking from High/Low flare.	N/A	K/O line sloped towards KO drum
		High Capacity	Y	N	None			

APPENDIX A: Photograph and Video Log

Media File	Description	Well Pad Name
entrysign-20241023-185051.jpg	Entry Sign	FBIR Guy Black Hawk 24X-27A
entrysign-20241023-193743.jpg	Entry Sign	FBIR Smith 11X-10A
entrysign-20241024-154944.jpg	Entry Sign	Bird Bear 35-26HA
entrysign-20241024-155659.jpg	Entry Sign	Good Voice 34-27H
entrysign-20241024-161117.jpg	Entry Sign	Young Bird 34-27HA

*In addition to recording metadata through the OGI camera’s system, EPA collected metadata for the media files recorded during the inspections, including the date, time, and location of the recorded media, in the Survey123 ArcGIS application at the time of the inspections. Due to a technical issue experienced with the OGI camera’s metadata captured for the .mp4-type files, the Survey123 metadata was used as the primary reference for verifying inspection media file data.