



Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	04/10/2024	
Media Program:	Air	
Regulatory Program(s)	SIP, NSPS	
Company Name:	Tap Rock Resources LLC	
Facility Name:	Multiple	
Facility Physical Location:	New Mexico Permian Basin	
(city, state, zip code)	Multiple	
Mailing address:	523 Park Point Drive, Suite 200	
(city, state, zip code)	Golden, CO 80401	
County/Parish:	Lea County	
Facility Phone Number	409-723-1966	
Facility Contact:	Bill Ramsey	Senior Environmental and Regulatory Specialist
	bramsey@taprk.com	
FRS Number:	Multiple	
Identification/Permit Number:	Multiple	
Media Identifier Number:	Multiple	
NAICS:	211120	
SIC:	1311	
Personnel participating in inspection:		
Kenneth R. McPherson	EPA Region 6 ECDAE	Life Scientist
Daniel Heins	EPA OECA AED	Environmental Engineer
Bailey Brown	EPA Region 6 ECDAE	Physical Scientist
Dominique Eades	EPA Region 6 ECDAE	Physical Scientist
Bill Ramsey	Tap Rock Resources	Senior Environmental and Regulatory Specialist
Brett Willmon	Tap Rock Resources	Production Foreman
Columbus Baham	Tap Rock Resources	Operations
Chris Martinez	CDH Consulting	Senior Environmental Engineer - Consultant
EPA Lead Inspector Signature/Date		
	Kenneth R. McPherson	Date
Supervisor Signature/Date		
	James Leathers	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

Environmental Protection Agency (“EPA”) inspectors Kenneth McPherson (EPA Region 6, “Region 6”), Bailey Brown (Region 6), Dominique Eades (Region 6), and Daniel Heins (EPA Office of Enforcement and Compliance Assurance “OECA”) arrived at the Pilot Travel Center at 3202 S Canal St, Carlsbad, New Mexico 88220 at 08:00 on April 10, 2024, for an announced inspection of Tap Rock Resources LLC (“Tap Rock”) facilities in the New Mexico Permian Basin. The facilities selected for inspection were not disclosed to Tap Rock until the day of the inspection. The EPA inspectors held an opening conference with Tap Rock representatives Bill Ramsey, Senior Environmental and Regulatory Specialist; Brett Willmon, Production Foreman; Columbus Baham, Operations; and Chris Martinez, Environmental Engineering Consultant, CDH Consulting. Inspector Brown presented her credentials to Mr. Ramsey, while I informed him that we were conducting an EPA inspection to determine compliance with each facility’s permit or Notice of Intent (“NOI”) applications and the Clean Air Act (“CAA”). The scope of the inspection was a partial compliance evaluation (“PCE”) and included evaluation of compliance with permits or NOI applications, the New Mexico State Implementation Plan (“SIP”), and federal CAA regulations. The sign-in sheets for the opening and closing conferences are found in **Appendix 3**.

GENERAL FACILITY DESCRIPTIONS

The inspection covered sixteen (16) facilities listed in **Table 1**. Tap Rock’s oil and gas production facilities followed three different layouts dependent on the number of drilled wells that feed the facility and well completion date. Facilities that serviced multiple drilled wells include a combination of new facilities that serviced newly drilled wells, and facilities that were expanded to service older drilled wells. Older low production facilities were “shut-in” and serviced only one or two drilled wells. The general facility descriptions for newer multi-well facilities, traditional multi-well facilities, and single-well facility design are below.

Newer Multi-well Facility Description

Fluid from the well(s) was directed to three-phase horizontal separator(s) (“SEP”) that separated the crude into oil, gas, and produced water. Oil and water mixed fluids from the SEP(s) were sent to the heater treater(s) (HT). Gas from the SEP(s) was routed to the gas lift compressor(s) (“GLC”), the sales pipeline, and/or the high-pressure (“HP”) flare during sales downtime. Produced water from the HT(s) was sent to the produced water storage tanks (“PWST”). Gas from the HT(s) was sent to the vapor recovery unit (“VRU”). Oil from the HT(s) was sent to the vertical recovery tower(s) (“VRT”). Oil from the VRT(s) was sent to oil storage tanks (“OST”). Gas from the VRT(s) was routed to the VRU or the low-pressure (“LP”) flare during VRU downtime. Vapors from the PWST(s) and OST(s) were routed through a shared vapor space to a tank blower or the LP flare during tank blower downtime. Oil from the OST(s) was routed through the lease automatic custody transfer (“LACT”) unit(s) to sales via an oil pipeline or truck loaded during sales downtime. Produced water from the PWST(s) was pipelined to a saltwater disposal facility. Vapors from the tank blower were routed to the VRU or to the LP flare during VRU downtime. Gas from the VRU is routed to the GLC(s), the sales pipeline, and/or the HP flare during sales downtime.

Traditional Multi-well Facility Description

Fluid from the well(s) was directed to three-phase SEP(s) that separated the crude into oil, gas, and produced water. Gas from the SEP(s) was routed to the GLC(s), the sales pipeline, and/or the HP flare during sales downtime. Oil from the SEP(s) were sent to the HT(s). Water from the SEP(s) was sent to the gun barrel separation tank ("GBT"). Gas from the HT(s) was sent to the VRU. Oil from the HT(s) was sent to the vapor recovery tower(s) ("VRT"). Water from the HT(s) was sent to the GBT. Oil from the VRT(s) was sent to the OST(s). Gas from the VRT(s) was sent to the VRU. Produced water from the GBT(s) was sent to the PWST(s). Vapors from the GST(s), slop oil tank(s) ("ST"), PWST(s), and OST(s) were routed through a shared vapor space to the tank blower or the LP flare during tank blower downtime. Oil from the OST(s) was routed through the LACT unit(s) to sales via an oil pipeline, or truck loaded during sales downtime. Skim oil from the OST(s) was sent to the ST. Produced water from the PWST(s) was pipelined to a salt disposal facility. Slop oil from the ST was routed either to the HT(s) or truck loading depending on facility design. Vapors from the tank blower were routed to the VRU or to the LP flare during VRU downtime. Gas from the VRU is routed to the GLC(s), the sales pipeline, and/or the HP flare during sales downtime.

Single-well Facility Description

Fluid from the well was directed to a three-phase vertical separator ("VSEP") and separated into oil, gas, and water. Oil from the VSEP was sent to the HT. The oil/condensate from the VSEP was sent to the horizontal separator [a.k.a. free water knockout ("FWKO")]. Water from the VSEP was sent to the PWST(s). Gas from the VSEP routed through a compressor to the sales pipeline, or to the HP flare during compressor or sales downtime. The FWKO separated the oil/condensate into oil and water. Oil from the FWKO was sent to the heater HT. Water from the FWKO was sent to the PWST(s). Oil from the HT was sent to the OST(s). Water from the HT was sent to the PWST(s). Gas from the HT was sent through the compressor to the sales pipeline, or to the HP flare during compressor or sales downtime. Vapors from the OST(s) and PWST(s) were tied together and were routed to an enclosed combustor. Oil was transported offsite via truck loading. Produced water was pipelined to a disposal facility and injected via injection well or transported of site via truck loading.

Section II – OBSERVATIONS

EPA inspectors were equipped with an FLIR-Teledyne model Gx620 optical gas imaging camera ("OGI camera"), a mPower Electronics model NEO MP184 photoionization detector ("PID") that measures total volatile organic compounds ("TVOC") in parts per million ("ppm"), and a Ricoh Model G700SE digital camera ("digital camera"). Photographs and videos taken during the inspection are found in **Appendix 1** and **2**, respectively.

Table 1: Tap Rock facilities inspected.

	Facility Name	Permit Type	Permit Number	Latitude, Longitude
1	Poseidon A CTB	GCP-O&G	8650M1	32.227263, -103.576644
2	Zeus CTB	GCP-O&G	8182M3	32.225585, -103.570904
3	Mogi 9 State Com 11H	Same Permit as Zeus CTB (co-located)		
4	Mogi 9 State Com 10H	GCP-O&G	NOI 6981	32.22503, -103.57343
5	Jackson Unit 33H	GCP-O&G	No Permit	32.22455, -103.57374
6	Brinninstool 4 State No. 4H	GCP-O&G	NOI 6977	32.22503, -103.57343
7	Hyperion A CTB	GCP-O&G	8613M5	32.207381, -103.601399
8	Prometheus C CTB	GCP-O&G	9473M2	32.199493, -103.559476
9	Jackson Unit 23H	GCP-O&G	NOI 6979	32.19642, -103.56335
10	Jackson Unit 22H	GCP-O&G	NOI 6978	32.19643, -103.5676
11	Jackson Unit 29H and 30H	GCP-O&G	NOI 8700	32.196903, -103.574147
12	Jackson Unit 28H	GCP-O&G	NOI 6980	32.19643, -103.57838
13	Bettis 20 State Com No. 2H	GCP-O&G	NOI 6973	32.183546, -103.600027
14	Bettis 20 State Com No. 3H	GCP-O&G	NOI 6974	32.19612, -103.59362
15	Bettis 20 State com No. 4H	GCP-O&G	NOI 6975	32.19617, -103.59747
16	Bettis 20 State Com No. 5H	GCP-O&G	NOI 6976	32.19648, -103.60163

1. Poseidon A CTB

We entered at the facility at 9:29 am (Photo 1). The facility was comprised of fourteen (14) wells, fourteen (14) SEPs, two (2) HTs, two (2) VRTs, one (1) sales scrubber, one (1) ST, one (1) GBT, six (6) OSTs, four (4) PWSTs, two (2) electric VRUs, one (1) tank blower, one (1) HP flare, one (1) LP flare, and two (2) GLCs. While onsite we observed uncontrolled hydrocarbon emissions trailing from the LP flare during flaring operations using the OGI camera (Video 1). [AOC 1] Tap Rock representatives confirmed the observation using their own equipment. We observed hydrocarbon emissions from the end of the pressure safety valve ("PSV") line on GLC Engine 1 using the OGI camera (Video 2 and Photo 2). [AOC 2a] Tap Rock representatives manually adjusted the PSV to address the problem. We observed hydrocarbon emissions from a breach in the GLC Engine 2 exhaust pipe leading to the catalytic converter using the OGI camera (Video 3 and Photo 3). [AOC 2b] Tap Rock representatives stated that they were aware of the problem and that they had submitted a workorder to address the issue with NOVA, the GLC owner. Tap Rock stated that the majority of its GLCs and other compressors used on its facilities were rented from NOVA. We departed the facility at 10:27 am.

2. Zeus CTB

We entered the facility at 10:36 am (Photo 4). The facility was comprised of two separate pads of differing facility histories. The Mogi 9 State Com 11H was an older facility and pad that Tap Rock representatives stated was reestablished and incorporated under the Zeus CTB permit. They further stated that the Mogi 9 State Com 11H well, production equipment, and batteries were temporarily shut-in due to economic costs.

Zeus CTB Pad Site

The pad site was comprised of thirteen (13) wells, fourteen (13) SEPs, five (5) HTs, two (2) VRTs, one (1) sales scrubber, one (1) ST, one (1) GBT, one (1) LACT unit, twelve (12) OSTs, five (5) PWSTs, one (1) electric VRU, one (1) HP flare, one (1) LP flare, and one (1) GLC. Tap Rock representatives stated that the wells were depleting and three (3) HTs were on standby to service future planned wells. While onsite we observed hydrocarbon emissions trailing from the GLC exhaust stack using the OGI camera (Video 4 and Photo 5). [AOC 2c] Tap Rock representatives confirmed the observation using their own equipment. We observed uncontrolled hydrocarbon emissions trailing from the LP flare during flaring operations using the OGI camera (Video 5 and Photo 6). [AOC 1]

Mogi 9 State Com 11H Pad Site

Tap Rock representatives stated that the well and all equipment was in temporary shut-in. The pad site consisted of one (1) well, one (1) VSEP, one (1) FWKO, one (1) HT, one (1) sales scrubber, four (4) OSTs, two (2) PWSTs, one (1) enclosed combustor, one (1) HP flare, and one (1) sales compressor. No hydrocarbon emissions were observed.

We departed the facility at 11:12 am.

3. Mogi 9 State Com 10H

We entered the facility at 11:18 am (Photo 7). Tap Rock representatives stated that the facility was temporarily shut-in due to economic costs. The facility was comprised of one (1) well, one (1) VSEP, one (1) FWKO, one (1) HT, four (4) OSTs, two (2) PWSTs, one (1) enclosed combustor, one (1) HP flare, and one (1) sales compressor. We observed hydrocarbon emissions from hatches on the top of Oil Tanks 2 (40454-2) and 3 (40454-3) (Video 6 and Photo 8). [AOC 3] Tap Rock maintenance made repairs to the OST hatch gaskets at 11:30 am and the hydrocarbon emissions ceased following their repairs. We observed uncontrolled hydrocarbon emissions from the top of the enclosed combustor (Video 7 and Photo 9). [AOC 4] The enclosed combustor appeared to have no heat signature. Tap Rock representatives confirmed observation with their equipment. We departed the facility at 11:32 am.

4. Jackson Unit 33H

We entered the facility at 11:34 am (Photo 10). Tap Rock representatives stated that the facility was temporarily shut-in due to economic costs. The facility was comprised of one (1) well, one (1) VSEP, one (1) FWKO, one (1) HT, four (4) OSTs, two (2) PWSTs, one (1) enclosed combustor, one (1) HP flare, and one (1) sales compressor. We observed hydrocarbon emissions from the pressure relief valve ("PRV") on the top of Oil Tank 4 (40514-4) (Video 8 and Photo 11). [AOC 5] Tap Rock representatives confirmed the observation with their equipment. Tap Rock representatives stated that the issue was previously known and that repair parts were ordered and awaiting arrival. We departed the facility at 11:40 am.

5. Brinninstool 4 State No. 4H

We entered the facility at 11:49 am (Photo 12). Tap Rock representatives stated that the facility was temporarily shut-in due to economic costs. The facility was comprised of one (1) well, one (1) VSEP, one (1) FWKO, one (1) HT, two (2) OSTs, two (2) PWSTs, one (1) enclosed combustor, one (1) HP flare, and one (1) sales compressor. We observed uncontrolled hydrocarbon emissions from the HP flare (Video 9 and Photo 13). [AOC 6] The pilot on the HP flare appeared to be unlit. Tap Rock representatives confirmed observation with their equipment. We observed uncontrolled hydrocarbon emissions from the enclosed combustor (Video 10 and Photo 14). [AOC 4] The enclosed combustor appeared to have no heat signature. Tap Rock representatives confirmed the observation with their equipment. We departed the facility at 12:05 pm.

6. Hyperion A CTB

We entered the facility at 12:29 pm (Photo 15). The facility consisted of nineteen (19) wells, nineteen (19) SEPs, one (1) HT, one (1) VRT, one (1) sales scrubber, 12 (12) OSTs, four (4) PWSTs, one (1) electric VRU, one (1) tank blower, one (1) LACT unit, one (1) HP flare, one (1) LP flare, and two (2) GLCs. While onsite we observed visual signs of incomplete combustion (smoke) trailing from the LP flare during flaring operations (Photo 16). We also observed uncontrolled hydrocarbon emissions trailing from both the LP flare and the HP flare during flaring operations using the OGI camera (Video 11 and Photo 17). [AOC 1 and AOC 7] Tap Rock representatives confirmed the observation using their own equipment. We observed hydrocarbon emissions trailing from the end of the exhaust stack of GLC Engine 1 using the OGI camera (Video 12 and Photo 18). [AOC 2c] Tap Rock representatives confirmed the observation using their equipment. We departed the facility at 1:02 pm.

7. Prometheus C CTB

We entered the facility at 1:17 pm (Photo 19). The facility consisted of nine (9) wells, nine (9) SEPs, one (1) HT, one (1) VRT, one (1) sales scrubber, six (6) OSTs, four (4) PWSTs, two (2) electric VRU, one (1) tank blower, one (1) LACT unit, one (1) HP flare, one (1) LP flare, and two (2) GLCs. While onsite we observed hydrocarbon emissions from a hatch on the top of Oil Tank 1 using the OGI camera (Video 13 and Photo 20). [AOC 3] Tap Rock representatives confirmed the observation using their own equipment. We observed hydrocarbon emissions trailing from the end of the exhaust stack of both GLC Engine 1 and GLC Engine 2 using the OGI camera (Video 14, Photo 21, and Photo 22). [AOC 2c] Tap Rock representatives confirmed the observation using their equipment. We departed the facility at 1:42 pm.

8. Jackson Unit 23H

We entered the facility at 1:46 pm (Photo 23). Tap Rock representatives stated that the facility was temporarily shut-in due to economic costs. The facility was comprised of one (1) well, one (1) VSEP, one (1) FWKO, one (1) HT, four (4) OSTs, two (2) PWSTs, one (1) enclosed combustor, one (1) HP flare, and one (1) sales compressor. We observed no hydrocarbon emissions while at the facility. We departed the facility at 1:50 pm.

9. Jackson Unit 22H

We entered the facility at 1:55 pm (Photo 24). Tap Rock representatives stated that the facility was temporarily shut-in due to economic costs. The facility was comprised of one (1) well, one (1) VSEP, one (1) FWKO, one (1) HT, four (4) OSTs, two (2) PWSTs, one (1) enclosed combustor, one (1) HP flare, and one (1) sales compressor. We observed no hydrocarbon emissions while at the facility. We departed the facility at 1:58 pm.

10. Jackson Unit 29H and 30H

We entered the facility at 2:02 pm (Photo 25). Tap Rock representatives stated that the facility was temporarily shut-in due to economic costs. The facility was comprised of two (2) wells, one (1) VSEP, one (1) FWKO, one (1) heater treater, four (4) OSTs, two (2) PWSTs, one (1) enclosed combustor, one (1) HP flare, and one (1) sales compressor. We observed no hydrocarbon emissions while at the facility. We departed the facility at 2:06 pm.

11. Jackson Unit 28H

We entered the facility at 2:10 pm (Photo 26). Tap Rock representatives stated that the facility was temporarily shut-in due to economic costs. The facility was comprised of one (1) well, one (1) VSEP, one (1) FWKO, one (1) HT, four (4) OSTs, two (2) PWSTs, one (1) enclosed combustor, one (1) HP flare, and one (1) sales compressor. We observed no hydrocarbon emissions while at the facility. We departed the facility at 2:06 pm.

12. Bettis 20 State Com No. 2H

We entered the facility at 2:19 pm (Photo 27). Tap Rock representatives stated that the facility was temporarily shut-in due to economic costs. The facility was comprised of one (1) well, one (1) VSEP, one (1) FWKO, one (1) HT, four (4) OSTs, two (2) PWSTs, one (1) enclosed combustor, one (1) HP flare, and one (1) sales compressor. While onsite we observed hydrocarbon emissions from the PRV on Oil Tank 1 (40420-1) using the OGI camera (Video 15 and Photo 28). [AOC 5] Tap Rock representatives confirmed

the observation using their equipment. They stated that they were previously aware of the problem and were awaiting repair parts. We observed uncontrolled hydrocarbon emissions from the enclosed combustor using the OGI camera (Video 16 and Photo 29). [AOC 4] The enclosed combustor appeared to have no heat signature. Tap Rock representatives confirmed the observation using their equipment. We observed uncontrolled hydrocarbon emissions from the HP flare using the OGI camera (Video 17 and Photo 30). [AOC 6] The pilot on the HP flare appeared to be unlit. Tap Rock representatives confirmed the observation using their equipment. We observed hydrocarbon emissions from the back pressure pilot valve to the back pressure pilot shut-off suction unit using the OGI camera (Video 18 and Photo 31). [AOC 8] Tap Rock representatives confirmed the observation using their equipment. We observed hydrocarbon emissions from the regulator on the sales compressor using the OGI camera (Video 19 and Photo 32). [AOC 2d] Tap Rock representatives confirmed the observation using their equipment. We departed the facility at 2:39 pm.

13. Bettis 20 State Com No. 3H

We entered the facility at 2:42 pm (Photo 33). Tap Rock representatives stated that the facility was temporarily shut-in due to economic costs. The facility was comprised of one (1) well, one (1) VSEP, one (1) FWKO, one (1) HT, four (4) OSTs, two (2) PWSTs, one (1) enclosed combustor, one (1) HP flare, and one (1) sales compressor. While onsite we observed uncontrolled hydrocarbon emissions from the enclosed combustor using the OGI camera (Video 20 and Photo 34). [AOC 4] The enclosed combustor appeared to have no heat signature. Tap Rock representatives confirmed the observation using their equipment. We departed the facility at 2:48 pm.

14. Bettis 20 State Com No. 4H

We entered the facility at 2:52 pm (Photo 35). Tap Rock representatives stated that the facility was temporarily shut-in due to economic costs. The facility was comprised of one (1) well, one (1) VSEP, one (1) FWKO, one (1) HT, four (4) OSTs, two (2) PWSTs, one (1) enclosed combustor, one (1) HP flare, and one (1) sales compressor. While onsite we observed uncontrolled hydrocarbon emissions from the enclosed combustor using the OGI camera (Video 21 and Photo 36). [AOC 4] The enclosed combustor appeared to have no heat signature. Tap Rock representatives confirmed the observation using their equipment. We departed the facility at 2:57 pm.

15. Bettis 20 State Com No. 5H

We entered the facility at 3:01 pm (Photo 37). Tap Rock representatives stated that the facility was temporarily shut-in due to economic costs. The facility was comprised of one (1) well, one (1) VSEP, one (1) FWKO, one (1) HT, four (4) OSTs, two (2) PWSTs, one (1) enclosed combustor, one (1) HP flare, and one (1) sales compressor. While onsite we observed hydrocarbon emissions from the PRV on the top of Oil Tank 1 (Video 22 and Photo 38). [AOC 5] Tap Rock representatives confirmed the observation using their equipment. We observed uncontrolled hydrocarbon emissions from the enclosed combustor using the OGI camera (Video 23 and Photo 39). [AOC 4] The enclosed combustor appeared to have no heat signature. Tap Rock representatives confirmed the observation using their equipment. We observed hydrocarbon emissions from the back-up pressure valve connector on the VSEP (Video 24 and Photo 40), the gauge pipe on the VSEP (Video 25 and Photo 41), and other pipelines for the VSEP (Video 26) using the OGI camera. [AOC 9 and AOC 10] Tap Rock representatives confirmed the observations using their equipment. We observed hydrocarbon emissions from the regulator on the sales gas compressor using the OGI camera (Video 27 and Photo 42). [AOC 2d] Tap Rock representatives confirmed the observations using their equipment. We observed hydrocarbon emissions from the sales compressor

crank casement using the OGI camera (Video 28 and Photo 43). [AOC 2e] Tap Rock representatives confirmed the observations using their equipment. We observed uncontrolled hydrocarbon emission from the HP flare (Video 29 and Photo 44). [AOC 6] The pilot on the HP flare appeared to be unlit. Tap Rock representatives confirmed the observation using their equipment. We departed the facility at 3:21 pm.

Section III – AREAS OF CONCERN

The following areas of concern (“AOC”) were based on our observations during the inspections of Tap Rock facilities.

1. Uncontrolled hydrocarbon emissions trailing from the LP flare past the heat plume during flaring operations at Poseidon A CTB, Zeus CTB, and Hyperion A CTB.
2. Hydrocarbon emissions from GLCs and sales gas compressors.
 - a. Hydrocarbon emissions from the pressure safety valve line on GLC Engine 1 at Poseidon A CTB.
 - b. Hydrocarbon emissions from a split in the GLC Engine 1 exhaust pipe prior to the catalytic converter at Poseidon A CTB.
 - c. Hydrocarbon emissions trailing for GLC exhaust stack past heat plume at Zeus CTB, Hyperion A CTB and Prometheus C CTB.
 - d. Hydrocarbon emissions from the regulator to the sales gas compressor at Bettis 20 State Com No. 2H and Bettis 20 State Com No. 5H.
 - e. Hydrocarbon emissions from the sales gas compressor crank casement at Bettis 20 State Com No. 5H.
3. Hydrocarbon emissions from oil tank hatches at Mogi 9 State Com 10H and Prometheus C CTB.
4. Uncontrolled emissions from non-operational (no heat signature) enclosed combustor at Mogi 9 State Com 10H, Brinninstool 4 State No. 4H, Bettis 20 State Com No. 2H, Bettis 20 State Com No. 3H, Bettis 20 State Com No. 4H, and Bettis 20 State Com No. 5H.
5. Hydrocarbon emissions from oil tank PRVs at Jackson Unit 33H, Bettis 20 State Com No. 2H, and Bettis 20 State Com No. 5H.
6. Uncontrolled hydrocarbon emissions from unlit HP flare at Brinninstool 4 State No. 4H, Bettis 20 State Com No. 2H, and Bettis 20 State Com No. 5H.
7. Uncontrolled hydrocarbon emissions trailing from the HP flare past the heat plume during flaring operations at Hyperion A CTB.
8. Hydrocarbon emissions from back pressure pilot valve to the back pressure pilot shut-off suction unit at Bettis 20 State Com No. 2H.
9. Hydrocarbon emissions from the VSEP back-up pressure valve connector at Bettis 20 State Com No. 5H.
10. Hydrocarbon emissions from VSEP gauge pipe at Bettis 20 State Com No. 5H.
11. No Notice of Intent or active permit for Jackson Unit 33H.

Inspectors McPherson, Brown, Eades, and Heins conducted a closing conference with Tap Rock representatives Bill Ramsey, Senior Regulatory and Environmental Specialist; Columbus Baham, Operations; and Chris Martinez, Consultant/Senior Environmental Quality Engineer (CDH Consulting) in the vicinity of the Tap Rock’s Bettis 20 State Com No. 5H facility at 3:36 pm on April 10, 2024. During the closing conference I reviewed ten (10) of the AOCs noted above. Additionally, AOC 11 was determined after the conclusion of the inspection and was not included in the closing conference. I informed Tap Rock representatives that I would share copies of the photos and videos recorded during the inspections with Tap Rock. I also informed Tap Rock that my goal was to provide them with a copy of the

consolidated inspection report within fifty (50) calendar days. We completed the closing conference at 4:00 pm.

Section IV – FOLLOW UP

On April 19, 2024, I requested additional documentation for each facility relating to permitting and authorization information, facility shut-in status and dates, maintenance records, and corrective actions and repairs related to the onsite inspection. Tap Rock provided the requested records on May 3, 2024.

On May 2, 2024, I provided electronic copies of digital photographs taken and videos recorded during the inspection to Tap Rock representative Bill Ramsey.

Section V – LIST OF APPENDICES

Appendix 1 – Photograph Log – 44 digital photographs taken 04/10/2024.

Appendix 2 – Video Log – 29 OGI camera videos taken 04/10/2024.

Appendix 3 – Opening and closing conference sign-in sheets.

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo 1

Location: Tap Rock Resources LLC / Poseidon A CTB		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010659.jpg

Date of Photo: 04/10/2024

Time of Photo: 9:38 AM

Photographer: Dominique Eades

Description: Signage for Tap Rock facility Poseidon A CTB on facility pad site.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo 2

Location: Tap Rock Resources LLC / Poseidon A CTB		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010666.jpg

Date of Photo: 04/10/2024

Time of Photo: 10:04 AM

Photographer: Dominique Eades

Description: Gas Lift Compressor Engine 1 pressure safety valve line with hydrocarbon emissions using an optical gas imaging camera.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1

Photograph Log

Photo 3

Location: Tap Rock Resources LLC / Poseidon A CTB		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010667.jpg

Date of Photo: 04/10/2024

Time of Photo: 10:07 AM

Photographer: Dominique Eades

Description: Gas Lift Compressor Engine 2 exhaust pipe hydrocarbon emissions prior to catalytic convert using an optical gas imaging camera.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Appendix 1

Photo 4

Location: Tap Rock Resources LLC / Zeus CTB		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010679.jpg

Date of Photo: 04/10/2024

Time of Photo: 10:41 AM

Photographer: Dominique Eades

Description: Signage for Tap Rock facility Zeus CTB at facility entrance.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo 5

Location: Tap Rock Resources LLC / Zeus CTB		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010682.jpg

Date of Photo: 04/10/2024

Time of Photo: 10:52 AM

Photographer: Dominique Eades

Description: Gas Lift Compressor Engine 1 hydrocarbon emissions observed trailing from exhaust stack using an optical gas imaging camera.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1

Photograph Log

Photo 6

Location: Tap Rock Resources LLC / Zeus CTB		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010683.jpg

Date of Photo: 04/10/2024

Time of Photo: 10:55 AM

Photographer: Dominique Eades

Description: Uncontrolled hydrocarbon emissions trailing from low-pressure flare during flaring operations using an optical gas imaging camera.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo 7

Location: Tap Rock Resources LLC / Mogi 9 State Com 10H		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010687.jpg

Date of Photo: 04/10/2024

Time of Photo: 11:19 AM

Photographer: Dominique Eades

Description: Signage for Tap Rock facility Mogi 9 State Com 10H at facility pad site.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo 8

Location: Tap Rock Resources LLC / Mogi 9 State Com 10H		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010689.jpg

Date of Photo: 04/10/2024

Time of Photo: 11:15 AM

Photographer: Dominique Eades

Description: Hydrocarbon emissions from hatches on the top of Oil Tank 2 and Oil Tank 3 using an optical gas imaging camera.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1

Photograph Log

Photo 9

Location: Tap Rock Resources LLC / Mogi 9 State Com 10H		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010690.jpg

Date of Photo: 04/10/2024

Time of Photo: 11:29 AM

Photographer: Dominique Eades

Description: Uncontrolled hydrocarbon emissions observed from the top of the Enclosed Combustor using an optical gas imaging camera.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo 10

Location: Tap Rock Resources LLC / Jackson Unit 33H		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010691.jpg

Date of Photo: 04/10/2024

Time of Photo: 11:34 AM

Photographer: Dominique Eades

Description: Signage for Tap Rock facility Jackson Unit 33H at facility pad site near well.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo 11

Location: Tap Rock Resources LLC / Jackson Unit 33H		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010693.jpg

Date of Photo: 04/10/2024

Time of Photo: 11:37 AM

Photographer: Dominique Eades

Description: Hydrocarbon emissions observed from pressure relief valve on the top of Oil Tank 4 (40414-4) using optical gas imaging camera.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo 12

Location: Tap Rock Resources LLC / Brinninstool 4 State No. 4H		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010694.jpg

Date of Photo: 04/10/2024

Time of Photo: 11:49 AM

Photographer: Dominique Eades

Description: Signage for Tap Rock facility Brinninstool 4 State 4H at facility entrance.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo 13

Location: Tap Rock Resources LLC / Brinninstool 4 State No. 4H		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010696.jpg

Date of Photo: 04/10/2024

Time of Photo: 11:59 AM

Photographer: Dominique Eades

Description: Uncontrolled hydrocarbon emissions observed from the high-pressure flare using an optical gas imaging camera.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo 14

Location: Tap Rock Resources LLC / Brinninstool 4 State No. 4H		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010697.jpg

Date of Photo: 04/10/2024

Time of Photo: 12:03 pm

Photographer: Dominique Eades

Description: Uncontrolled hydrocarbon emissions observed from the enclosed combustor using an optical gas imaging camera.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo 15

Location: Tap Rock Resources LLC / Hyperion A CTB		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010698.jpg

Date of Photo: 04/10/2024

Time of Photo: 12:29 pm

Photographer: Dominique Eades

Description: Signage for Tap Rock facility Hyperion A CTB at facility entrance.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo 16

Location: Tap Rock Resources LLC / Hyperion A CTB		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010701.jpg

Date of Photo: 04/10/2024

Time of Photo: 12:38 pm

Photographer: Dominique Eades

Description: Uncontrolled hydrocarbon emissions observed trailing from the low-pressure flare during flaring operations using an optical gas imaging camera.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo 17

Location: Tap Rock Resources LLC / Hyperion A CTB		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010702.jpg

Date of Photo: 04/10/2024

Time of Photo: 12:40 pm

Photographer: Dominique Eades

Description: Uncontrolled hydrocarbon emissions observed trailing from the high-pressure flare using an optical gas imaging camera.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo 18

Location: Tap Rock Resources LLC / Hyperion A CTB		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010703.jpg

Date of Photo: 04/10/2024

Time of Photo: 12:43 pm

Photographer: Dominique Eades

Description: Hydrocarbon emissions observed trailing from the exhaust stack of gas lift compressor Engine 1 using an optical gas imaging camera.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo 19

Location: Tap Rock Resources LLC / Prometheus C CTB		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010723.jpg
Date of Photo: 04/10/2024
Time of Photo: 1:17 pm
Photographer: Dominique Eades
Description: Signage for Tap Rock facility Prometheus CTB at facility entrance.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo 20

Location: Tap Rock Resources LLC / Prometheus C CTB		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010725.jpg

Date of Photo: 04/10/2024

Time of Photo: 1:26 pm

Photographer: Dominique Eades

Description: Hydrocarbon emissions observed from a hatch on the top of Oil Tank 1 using an optical gas imaging camera.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo 21

Location: Tap Rock Resources LLC / Prometheus C CTB		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010726.jpg

Date of Photo: 04/10/2024

Time of Photo: 1:39 pm

Photographer: Dominique Eades

Description: Hydrocarbon emissions observed trailing from the exhaust stack of gas lift compressor Engine 1 using an optical gas imaging camera.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo 22

Location: Tap Rock Resources LLC / Prometheus C CTB		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010727.jpg

Date of Photo: 04/10/2024

Time of Photo: 1:39 pm

Photographer: Dominique Eades

Description: Hydrocarbon emissions observed trailing from the exhaust stack of gas lift compressor Engine 2 using an optical gas imaging camera.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo 23

Location: Tap Rock Resources LLC / Jackson Unit 23H		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010728.jpg

Date of Photo: 04/10/2024

Time of Photo: 1:48 pm

Photographer: Dominique Eades

Description: Signage for Tap Rock facility Jackson Unit 23H at facility pad site.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo 24

Location: Tap Rock Resources LLC / Jackson Unit 22H		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010730.jpg

Date of Photo: 04/10/2024

Time of Photo: 1:55 pm

Photographer: Dominique Eades

Description: Signage for Tap Rock facility Jackson Unit 22H near well at facility pad site.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo 25

Location: Tap Rock Resources LLC / Jackson Unit 29H and 30H		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010732.jpg

Date of Photo: 04/10/2024

Time of Photo: 2:04 pm

Photographer: Dominique Eades

Description: Signage for Tap Rock facility Jackson Unit 29H and 30H at facility pad site.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo 26

Location: Tap Rock Resources LLC / Jackson Unit 28H		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010734.jpg

Date of Photo: 04/10/2024

Time of Photo: 2:11 pm

Photographer: Dominique Eades

Description: Signage for Tap Rock facility Jackson Unit 28H near well at facility pad site.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo 27

Location: Tap Rock Resources LLC / Bettis 20 State Com No. 2H		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010736.jpg

Date of Photo: 04/10/2024

Time of Photo: 2:11 pm

Photographer: Dominique Eades

Description: Signage for Tap Rock facility Bettis 20 State Com No. 2H at facility pad site.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo 28

Location: Tap Rock Resources LLC / Bettis 20 State Com No. 2H		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010737.jpg

Date of Photo: 04/10/2024

Time of Photo: 2:22 pm

Photographer: Dominique Eades

Description: Hydrocarbon emissions observed from the pressure relief valve on top of Oil Tank 1 (40420-1) using an optical gas imaging camera.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo 29

Location: Tap Rock Resources LLC / Bettis 20 State Com No. 2H		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010738.jpg

Date of Photo: 04/10/2024

Time of Photo: 2:30 pm

Photographer: Dominique Eades

Description: Uncontrolled hydrocarbon emissions observed from the enclosed combustor using an optical gas imaging camera.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1

Photograph Log

Photo 30

Location: Tap Rock Resources LLC / Bettis 20 State Com No. 2H		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010739.jpg

Date of Photo: 04/10/2024

Time of Photo: 2:33 pm

Photographer: Dominique Eades

Description: Uncontrolled hydrocarbon emissions observed from the high-pressure flare using an optical gas imaging camera.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo 31

Location: Tap Rock Resources LLC / Bettis 20 State Com No. 2H		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010740.jpg

Date of Photo: 04/10/2024

Time of Photo: 2:33 pm

Photographer: Dominique Eades

Description: Hydrocarbon emissions observed from the back pressure pilot valve to the back pressure pilot shut-off suction using an optical gas imaging camera.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo 32

Location: Tap Rock Resources LLC / Bettis 20 State Com No. 2H		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010741.jpg

Date of Photo: 04/10/2024

Time of Photo: 2:38 pm

Photographer: Dominique Eades

Description: Hydrocarbon emissions observed from the regulator on the sales compressor using an optical gas imaging camera.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo 33

Location: Tap Rock Resources LLC / Bettis 20 State Com No. 3H		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010742.jpg

Date of Photo: 04/10/2024

Time of Photo: 2:45 pm

Photographer: Dominique Eades

Description: Signage for Tap Rock facility Bettis 20 State Com No. 3H at facility pad site.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo 34

Location: Tap Rock Resources LLC / Bettis 20 State Com No. 3H		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010744.jpg

Date of Photo: 04/10/2024

Time of Photo: 2:47 pm

Photographer: Dominique Eades

Description: Uncontrolled hydrocarbon emissions observed from the enclosed combustor using an optical gas imaging camera.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo 35

Location: Tap Rock Resources LLC / Bettis 20 State Com No. 4H		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010745.jpg

Date of Photo: 04/10/2024

Time of Photo: 2:54 pm

Photographer: Dominique Eades

Description: Signage for Tap Rock facility Bettis 20 State Com No. 4H at facility pad site.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo 36

Location: Tap Rock Resources LLC / Bettis 20 State Com No. 4H		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010748.jpg

Date of Photo: 04/10/2024

Time of Photo: 2:57 pm

Photographer: Dominique Eades

Description: Uncontrolled hydrocarbon emissions observed from the enclosed combustor using an optical gas imaging camera.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo 37

Location: Tap Rock Resources LLC / Bettis 20 State Com No. 5H		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010749.jpg

Date of Photo: 04/10/2024

Time of Photo: 3:03 pm

Photographer: Dominique Eades

Description: Signage for Tap Rock facility Bettis 20 State Com No. 5H at facility pad site.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo 38

Location: Tap Rock Resources LLC / Bettis 20 State Com No. 5H		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010750.jpg

Date of Photo: 04/10/2024

Time of Photo: 3:06 pm

Photographer: Dominique Eades

Description: Hydrocarbon emissions observed from pressure relief valve on top of Oil Tank 1 (40510-1) using an optical gas imaging camera.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo 39

Location: Tap Rock Resources LLC / Bettis 20 State Com No. 5H		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010752.jpg

Date of Photo: 04/10/2024

Time of Photo: 3:06 pm

Photographer: Dominique Eades

Description: Uncontrolled hydrocarbon emissions observed from the enclosed combustor using an optical gas imaging camera.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo 40

Location: Tap Rock Resources LLC / Bettis 20 State Com No. 5H		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010754.jpg

Date of Photo: 04/10/2024

Time of Photo: 3:13 pm

Photographer: Dominique Eades

Description: Hydrocarbon emissions observed from the back-up pressure valve connector and pipes to the vertical separator using an optical gas imaging camera.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo 41

Location: Tap Rock Resources LLC / Bettis 20 State Com No. 5H		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010753.jpg

Date of Photo: 04/10/2024

Time of Photo: 3:11 pm

Photographer: Dominique Eades

Description: Hydrocarbon emissions observed from the back-up gauge piping to the vertical separator using an optical gas imaging camera.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 1

Photo 42

Location: Tap Rock Resources LLC / Bettis 20 State Com No. 5H		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010755.jpg

Date of Photo: 04/10/2024

Time of Photo: 3:15 pm

Photographer: Dominique Eades

Description: Hydrocarbon emissions observed from the regulator on the sales compressor using an optical gas imaging camera.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo 43

Location: Tap Rock Resources LLC / Bettis 20 State Com No. 5H		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010756.jpg

Date of Photo: 04/10/2024

Time of Photo: 3:18 pm

Photographer: Dominique Eades

Description: Hydrocarbon emissions observed from the sales compressor crank casement using an optical gas imaging camera.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1

Photograph Log

Photo 44

Location: Tap Rock Resources LLC / Bettis 20 State Com No. 5H		
City: NW of Jal	County: Lea County	State: New Mexico



Photo File Name: R0010757.jpg

Date of Photo: 04/10/2024

Time of Photo: 3:20 pm

Photographer: Dominique Eades

Description: Uncontrolled hydrocarbon emissions observed from the high-pressure flare using an optical gas imaging camera.

Appendix 2

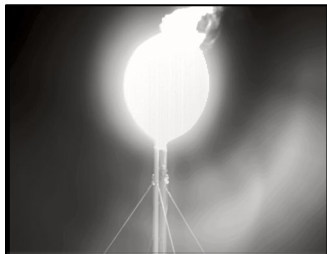
Video Log



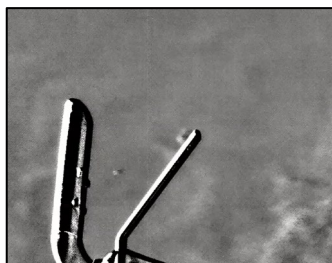
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Video Log

Location: Tap Rock / New Mexico Permian Basin		
City: NW of Jal	County: Lea County	State: New Mexico



Video: 1
 Video File Name: [FLIR0095.mp4](#)
 Date of Video: 04/10/2024
 Time of Video: 09:40 AM
 Videographer: Daniel Heins
 Description: Posiedon A Central Tank Battery - Assisted Flare.
 Visible uncombusted hydrocarbon emissions
 observed trailing from flare combustion zone.



Video: 2
 Video File Name: [FLIR0096.mp4](#)
 Date of Video: 04/10/2024
 Time of Video: 10:06 AM
 Videographer: Daniel Heins
 Description: Posiedon A Central Tank Battery - Compressor.
 Visible hydrocarbon emissions observed trailing
 from open ended line associated with compressor.



Video: 3
 Video File Name: [FLIR0097.mp4](#)
 Date of Video: 04/10/2024
 Time of Video: 10:08 AM
 Videographer: Daniel Hein
 Description: Posiedon A Central Tank Battery - Compressor.
 Visible hydrocarbon emissions observed trailing
 from compressor exhaust, and an exhaust leak with
 visible emissions prior to the catalytic converter.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Video Log

Location: Tap Rock / New Mexico Permian Basin		
City: NW of Jal	County: Lea County	State: New Mexico



Video: 4
 Video File Name: [FLIR0098.mp4](#)
 Date of Video: 04/10/2024
 Time of Video: 10:52 AM
 Videographer: Daniel Heins
 Description: Zeus CTB – Compressor. Visible hydrocarbon emissions observed trailing from compressor exhaust.



Video: 5
 Video File Name: [FLIR0099.mp4](#)
 Date of Video: 04/10/2024
 Time of Video: 10:57 AM
 Videographer: Daniel Heins
 Description: Zeus CTB – Low Pressure Flare. Visible uncombusted hydrocarbon emissions observed trailing from the combustion zone of the flare.



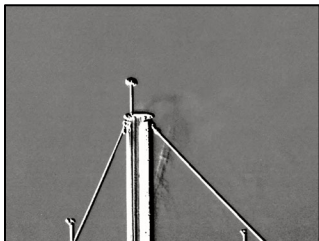
Video: 6
 Video File Name: [FLIR0101.mp4](#)
 Date of Video: 04/10/2024
 Time of Video: 11:26 AM
 Videographer: Daniel Hein
 Description: Mogi 9 State Com 10H– Tank Battery. Visible hydrocarbon emissions observed from hatches on Tank 2 and Tank 3.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Video Log

Location: Tap Rock / New Mexico Permian Basin		
City: NW of Jal	County: Lea County	State: New Mexico



Video: 7
 Video File Name: [FLIR0102.mp4](#)
 Date of Video: 04/10/2024
 Time of Video: 11:29 AM
 Videographer: Daniel Heins
 Description: Mogi 9 State Com 10H – Enclosed Combustor. Visible uncombusted hydrocarbon emissions observed from stack when combustor was off.



Video: 8
 Video File Name: [FLIR0103.mp4](#)
 Date of Video: 04/10/2024
 Time of Video: 11:36 AM
 Videographer: Daniel Heins
 Description: Jackson Unit 33H – Tank Battery. Visible hydrocarbon emissions observed trailing from a pressure relief valve on Tank 40514-4.



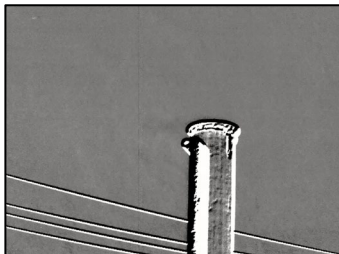
Video: 9
 Video File Name: [FLIR0104.mp4](#)
 Date of Video: 04/10/2024
 Time of Video: 12:01 PM
 Videographer: Daniel Hein
 Description: Brininstool 4 State No. 4H – High Pressure Flare. Visible uncontrolled hydrocarbon emissions observed from unlit flare.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Video Log

Location: Tap Rock / New Mexico Permian Basin		
City: NW of Jal	County: Lea County	State: New Mexico



Video: 10
 Video File Name: [FLIR0105.mp4](#)
 Date of Video: 04/10/2024
 Time of Video: 12:05 PM
 Videographer: Daniel Heins
 Description: Brininstool 4 State No. 4H – Enclosed Combustor. Visible uncombusted hydrocarbon emissions observed from enclosed combustor with no heat signature.



Video: 11
 Video File Name: [FLIR0106.mp4](#)
 Date of Video: 04/10/2024
 Time of Video: 12:43 PM
 Videographer: Bailey Brown
 Description: Hyperion A CTB – Both Flares. Visible uncombusted hydrocarbon emissions observed trailing from the combustion zone of both flares.



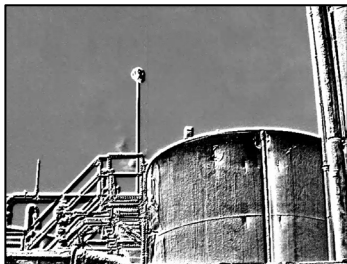
Video: 12
 Video File Name: [FLIR0107.mp4](#)
 Date of Video: 04/10/2024
 Time of Video: 12:46 PM
 Videographer: Bailey Brown
 Description: Hyperion A CTB – Compressor No. 1. Visible hydrocarbon emissions observed trailing from compressor exhaust.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Video Log

Location: Tap Rock / New Mexico Permian Basin		
City: NW of Jal	County: Lea County	State: New Mexico



Video: 13
 Video File Name: [FLIR0108.mp4](#)
 Date of Video: 04/10/2024
 Time of Video: 1:27 PM
 Videographer: Daniel Heins
 Description: Promethius C CTB – Tank Battery. Visible hydrocarbon emissions observed from hatch on Oil Tank No. 1.



Video: 14
 Video File Name: [FLIR0109.mp4](#)
 Date of Video: 04/10/2024
 Time of Video: 1:40 PM
 Videographer: Daniel Heins
 Description: Promethius C CTB – Compressors. Visible hydrocarbon emissions observed trailing from exhaust stacks of Compressors No. 1 and No. 2.



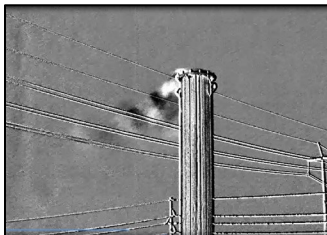
Video: 15
 Video File Name: [FLIR0110.mp4](#)
 Date of Video: 04/10/2024
 Time of Video: 2:23 PM
 Videographer: Daniel Heins
 Description: Bettis 20 State Com No. 2H – Tank Battery. Visible hydrocarbon emissions observed trailing from pressure relief valve on Oil Tank No. 1.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Video Log

Location: Tap Rock / New Mexico Permian Basin		
City: NW of Jal	County: Lea County	State: New Mexico



Video: 16
 Video File Name: [FLIR0111.mp4](#)
 Date of Video: 04/10/2024
 Time of Video: 2:27 PM
 Videographer: Daniel Heins
 Description: Bettis 20 State Com No. 2H – Enclosed Combustor. Visible uncontrolled hydrocarbon emissions observed from enclosed combustor with no heat signature.



Video: 17
 Video File Name: [FLIR0112.mp4](#)
 Date of Video: 04/10/2024
 Time of Video: 2:30 PM
 Videographer: Daniel Heins
 Description: Bettis 20 State Com No. 2H – Flare. Visible uncontrolled hydrocarbon emissions observed from unlit flare.



Video: 18
 Video File Name: [FLIR0113.mp4](#)
 Date of Video: 04/10/2024
 Time of Video: 2:33 PM
 Videographer: Daniel Heins
 Description: Bettis 20 State Com No. 2H – Compressor. Visible hydrocarbon emissions observed from back pressure pilot valve.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Video Log

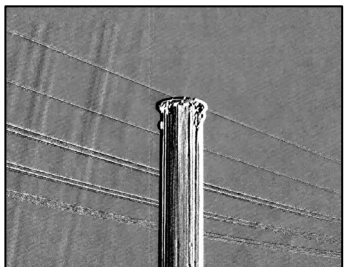
Location: Tap Rock / New Mexico Permian Basin		
City: NW of Jal	County: Lea County	State: New Mexico



Video: 19
 Video File Name: [FLIR0114.mp4](#)
 Date of Video: 04/10/2024
 Time of Video: 2:39 PM
 Videographer: Daniel Heins
 Description: Bettis 20 State Com No. 2H – Compressor. Visible hydrocarbon emissions observed from the compressor regulator.



Video: 20
 Video File Name: [FLIR0115.mp4](#)
 Date of Video: 04/10/2024
 Time of Video: 2:47 PM
 Videographer: Daniel Heins
 Description: Bettis 20 State Com No. 3H – Enclosed Combustor. Visible uncontrolled hydrocarbon emissions observed from enclosed combustor with no heat signature.



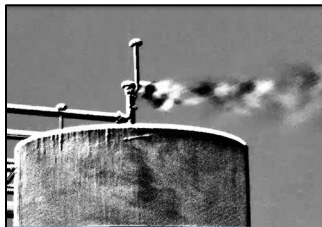
Video: 21
 Video File Name: [FLIR0116.mp4](#)
 Date of Video: 04/10/2024
 Time of Video: 2:59 PM
 Videographer: Daniel Heins
 Description: Bettis 20 State Com No. 4H – Enclosed Combustor. Visible uncontrolled hydrocarbon emissions observed from enclosed combustor with no heat signature.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Video Log

Location: Tap Rock / New Mexico Permian Basin		
City: NW of Jal	County: Lea County	State: New Mexico



Video: 22
 Video File Name: [FLIR0117.mp4](#)
 Date of Video: 04/10/2024
 Time of Video: 3:06 PM
 Videographer: Daniel Heins
 Description: Bettis 20 State Com No. 5H – Tank Battery. Visible hydrocarbon emissions observed from pressure relief valve on top of Oil Tank No. 1.



Video: 23
 Video File Name: [FLIR0118.mp4](#)
 Date of Video: 04/10/2024
 Time of Video: 3:08 PM
 Videographer: Daniel Heins
 Description: Bettis 20 State Com No. 5H – Enclosed Combustor. Visible uncontrolled hydrocarbon emissions observed from enclosed combustor with no heat signature.



Video: 24
 Video File Name: [FLIR0119.mp4](#)
 Date of Video: 04/10/2024
 Time of Video: 3:10 PM
 Videographer: Daniel Heins
 Description: Bettis 20 State Com No. 5H – Verticle Separator. Visible hydrocarbon emissions observed from back pressure valve on verticle separator.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Video Log

Location: Tap Rock / New Mexico Permian Basin		
City: NW of Jal	County: Lea County	State: New Mexico



Video: 25
 Video File Name: [FLIR0120.mp4](#)
 Date of Video: 04/10/2024
 Time of Video: 3:11 PM
 Videographer: Daniel Heins
 Description: Bettis 20 State Com No.5H – Verticle Separator.
 Visible hydrocarbon emissions observed from guage
 piping for verticle separator.



Video: 26
 Video File Name: [FLIR0121.mp4](#)
 Date of Video: 04/10/2024
 Time of Video: 3:15 PM
 Videographer: Daniel Heins
 Description: Bettis 20 State Com No.5H – Verticle Separator.
 Visible hydrocarbon emissions observed from piping
 to verticle separator



Video: 27
 Video File Name: [FLIR0122.mp4](#)
 Date of Video: 04/10/2024
 Time of Video: 3:17 PM
 Videographer: Daniel Heins
 Description: Bettis 20 State Com No.5H – Compressor. Visible
 hydrocarbon emissions observed from regulator on
 compressor.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Video Log

Location: Tap Rock / New Mexico Permian Basin		
City: NW of Jal	County: Lea County	State: New Mexico



Video: 28
 Video File Name: [FLIR0123.mp4](#)
 Date of Video: 04/10/2024
 Time of Video: 3:18 PM
 Videographer: Daniel Heins
 Description: Bettis 20 State Com No.5H – Compressor. Visible hydrocarbon emissions observed from crank casement of compressor.



Video: 29
 Video File Name: [FLIR0124.mp4](#)
 Date of Video: 04/10/2024
 Time of Video: 3:22 PM
 Videographer: Daniel Heins
 Description: Bettis 20 State Com No. 5H – Flare. Visible uncontrolled hydrocarbon emissions observed from unlit flare.

Appendix – 3

Opening and Closing Conference Sign-in Sheets



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Opening and Closing Conference Sign-in Sheets

Location: Tap Rock Resources LLC / Multiple New Mexico Permian Basin Facilities		
City: NW of Jal	County: Lea County	State: New Mexico

FRS: _____ Company Name: **Tap Rock Resources LLC** Page 5 of 40
Opening/Pre-Inspection Meeting

Commence opening/pre-inspection meeting..... Time: **08:00**

Name	Title	Representing	Email
Kenneth R. McPherson	LEAD INSPECTOR, LIFE SCIENTIST	EPA Region 6	mcpherson.kenneth@epa.gov
Brett Willmon	Production Foreman	Taprock	bwillmon@taprock.com
Bill Ramsey	Sr. Environmental & Regulatory specialist	Taprock	bramsey@taprock.com
Chris Martinez	Sr. Env Engineer - Consultant	Tap Rock/CDH	cmartinez@cdhconsult.com
DAN HEIN'S	AIR INSPECTOR	EPA/OECA/AED	heins.daniel@epa.gov
Dominguez Eades	Physical Scientist	EPA RL	eades.dominguez@epa.gov
Bailey Brown	Physical Scientist	EPA RL	brown.bailey@epa.gov
Colin Bus Baham	Operations	TAP ROCK	PHUT56baham@centura.com

Conclude opening/pre-inspection meeting..... Time: **08:20**

Initials / Date: **MM 04/10/2021**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Opening and Closing Conference Sign-in Sheets

Location: Tap Rock Resources LLC / Multiple New Mexico Permian Basin Facilities		
City: NW of Jal	County: Lea County	State: New Mexico

FRS: _____ Company Name: Tap Rock Resources LLC Page 38 of 40

Exit interview / Out-briefing Meeting

Commenced meeting: _____ Time: 15:36

Name	Title	Representing	Email
Kenneth R. McPherson	Lead Inspector, Life Scientist	USEPA RLC	mcpherson.kenneth@epa.gov
Domingo Eades	Physical Scientist	EPA RLC	eades.domingo@epa.gov
DAN HEINS	AR INSPECTOR	EPA HQ	HEINS,DANIEL@EPA.GOV
Bailey Brown	Physical Scientist	EPA RLC	brown.bailey@epa.gov
Calvinus Baham	Operations	TAP ROCK	BAUT256AHAM@gmail.com
Bill Ramsey	Sr Regulatory & Environmental Specialist	Tap Rock	bramsey@taprock.com
Chris Martinez	Sr Air Quality Eng/Consultant	Tap Rock/CDH	cmartinez@cdhconsult.com

Conclude meeting: _____ Time: 16:00

Initials / Date: 14M 10/10/2024