



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

**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
Infinity Natural Resources (INR) Goebeler Well Pad

**FROM:** Victoria Nelson, Environmental Engineer  
AECAB (MI/WI)

**THRU:** Sarah Marshall, Section Supervisor  
AECAB (MI/WI)

**TO:** File

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**BASIC INFORMATION**

**Facility Name:** Infinity Natural Resources (INR) Goebeler Well Pad

**Facility Location:** 150 Spring Rd NW Minerva, Ohio 44657 (40.643901, -81.098198)

**Date of Inspection:** August 29, 2022

**EPA Inspectors:**

1. Victoria Nelson, Environmental Engineer
2. Jacob Herbers, Environmental Engineer
3. Sasha Letuchy, Environmental Engineer
4. Manoj Patel, Environmental Engineer
5. Laura Neudorf, Environmental Engineer

**Other Attendees:**

1. Bill Veigel, Production Manager, INR
2. Larry Barr, Supervisor, INR

**Contact Email Address:** BVeigel@infinitynr.com

**Purpose of Inspection:** To assess compliance with the facility's Permit-to-Install and Operate, and the Clean Air Act

**Facility Type:** Oil and gas well pad

**Regulations Central to Inspection:** NSPS Subpart OOOO/OOOOa - Standards of Performance for Crude Oil and Natural Gas Facilities

**Arrival Time:** 14:00 EDT

**Departure Time:** 14:45 EDT

**Inspection Type:**

- ☐ Unannounced Inspection
- ☒ Announced Inspection

**OPENING CONFERENCE**

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Small Business Resource Information Sheet not provided. Reason: Not a small business
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Bill Veigel and Larry Barr, unless otherwise noted.

**Process Description:**

At the south well pad, an oil/gas/water emulsion is extracted from the formation through three wells that each flow into a sand trap, a gas processing unit (GPU), and a three-phase separator. From there, the oil/condensate is sent through a heater treater and then into three tanks, and the produced water is sent into three tanks. The tanks feed to two combustors, which are the primary emission control devices. At the north well pad, an oil/gas/water emulsion is extracted from the formation through seven wells that each flow into a sand trap, a gas processing unit, and a three-phase separator. From there, the oil/condensate is sent through two heater treaters and then into six tanks, and the produced water is sent into three tanks. The tanks feed to four combustors, the middle two being the primary emission control devices. The gas is sent to pipeline for further processing.

**Staff Interview:** Facility staff said that they have 10 well heads, with wells 4H and 10H not yet producing. They said this site produces approximately 3,000 barrels per day. Wells 1H-3H are the oldest and produces less than the newer wells 5H-9H. Larry Barr stated that the valve (vertical pipe) on the south tank battery was emitting even when the valve was closed.

**TOUR INFORMATION**

**EPA Tour of the Facility:** Yes

**Data Collected and Observations:**

EPA observed emissions from at least two combustors. With the FLIR camera, EPA inspectors observed emissions from a thief hatch, a conservation vent, and a valve on the South tank

battery. There was also oily residue on the thief hatch. EPA noted strong odors while on the catwalk of the South tank battery.

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

**Field Measurements:** were not taken during this inspection.

### **CLOSING CONFERENCE**

☒ Provided U.S. EPA point of contact to the facility

**Concerns:** EPA had concerns about design and operation of the vapor capture and control systems at the facilities, which we discussed with INR representatives. EPA's concerns stemmed from observed emissions from components atop the South tank battery.

### **DIGITAL SIGNATURES**

Report Author: **VICTORIA NELSON** Digitally signed by  
VICTORIA NELSON  
Date: 2022.10.25  
16:16:28 -05'00'

Section Supervisor: **SARAH MARSHALL** Digitally signed by  
SARAH MARSHALL  
Date: 2022.10.26  
10:01:45 -05'00'

## **APPENDIX A: DIGITAL IMAGE LOG**

|                                         |                                                                           |
|-----------------------------------------|---------------------------------------------------------------------------|
| <b>1. Inspector Name:</b> Jacob Herbers | <b>2. Archival Record Location:</b> Region 5<br>Electronic Records Center |
|-----------------------------------------|---------------------------------------------------------------------------|

| <b>Image #</b> | <b>File Name</b> | <b>Date and Time</b>    | <b>Description of Image</b>                                        |
|----------------|------------------|-------------------------|--------------------------------------------------------------------|
| 1              | IMG_0189.JPG     | 2022:08:29 14:04:35 EDT | Wells 1H-3H                                                        |
| 2              | IMG_0190.JPG     | 2022:08:29 14:04:52 EDT | South tank battery                                                 |
| 3              | IMG_0191.JPG     | 2022:08:29 14:05:13 EDT | Combustors                                                         |
| 4              | IMG_0192.JPG     | 2022:08:29 14:05:26 EDT | South tank battery                                                 |
| 5              | IMG_0193.JPG     | 2022:08:29 14:07:50 EDT | West combustors                                                    |
| 6              | IMG_0194.JPG     | 2022:08:29 14:09:17 EDT | South tank battery Nameplate                                       |
| 7              | IMG_0195.JPG     | 2022:08:29 14:10:14 EDT | Thief hatch with oily residue on Tank 2H of the South tank battery |
| 8              | IMG_0196.JPG     | 2022:08:29 14:12:09 EDT | Thief hatch with oily residue on Tank 2H of the South tank battery |
| 9              | IMG_0197.JPG     | 2022:08:29 14:19:07 EDT | South tank battery                                                 |
| 10             | IMG_0198.JPG     | 2022:08:29 14:23:32 EDT | North tank battery                                                 |
| 11             | IMG_0199.JPG     | 2022:08:29 14:23:51 EDT | North tank battery nameplate                                       |
| 12             | IMG_0200.JPG     | 2022:08:29 14:28:00 EDT | Thief hatch on center tank of the North tank battery               |
| 13             | IMG_0201.JPG     | 2022:08:29 14:28:15 EDT | Thief hatch on West tank of the North tank battery                 |
| 14             | IMG_0202.JPG     | 2022:08:29 14:32:39 EDT | GPUs and sand traps                                                |
| 15             | IMG_0203.JPG     | 2022:08:29 14:39:04 EDT | GPUs and compressor                                                |

## **APPENDIX B: DIGITAL VIDEO LOG**

|                                                          |                                                                           |
|----------------------------------------------------------|---------------------------------------------------------------------------|
| <b>1. Inspector Name:</b> Victoria Nelson, Sasha Letuchy | <b>2. Archival Record Location:</b> Region 5<br>Electronic Records Center |
|----------------------------------------------------------|---------------------------------------------------------------------------|

| <b>Video #</b> | <b>File Name</b> | <b>Date &amp; Time</b> | <b>Description of Video</b>                                                             |
|----------------|------------------|------------------------|-----------------------------------------------------------------------------------------|
| 1              | MOV_2803.mp4     | 8/29/22 14:03 EDT      | Emissions from pipe off the header line on condensate tank 3H of the South tank battery |
| 2              | MOV_2634.mp4     | 8/29/22 14:05 EDT      | Tank 2H                                                                                 |
| 3              | MOV_2804.mp4     | 8/29/22 14:07 EDT      | Emissions from thief hatch on produced water Tank 2H of the South tank battery          |
| 4              | MOV_2635.mp4     | 8/29/22 14:08 EDT      | Top of south tank battery                                                               |
| 5              | MOV_2805.mp4     | 8/29/22 14:09 EDT      | Emissions from conservation vent on produced water Tank 3H of the South tank battery    |
| 6              | MOV_2636.mp4     | 8/29/22 14:10 EDT      | Combustors                                                                              |
| 7              | MOV_2637.mp4     | 8/29/22 14:29 EDT      | Sand traps and heater treaters                                                          |

|    |              |                   |                                                          |
|----|--------------|-------------------|----------------------------------------------------------|
| 8  | MOV_2806.mp4 | 8/29/22 14:30 EDT | Portable compressor next to GPUs                         |
| 9  | MOV_2807.mp4 | 8/29/22 14:33 EDT | Emissions from South heater treater                      |
| 10 | MOV_2638.mp4 | 8/29/22 14:33 EDT | Indirect fired heater condensate stabilizer – two stacks |
| 11 | MOV_2808.mp4 | 8/29/22 14:36 EDT | Combustor #3/4 of the North combustor set                |
| 12 | MOV_2809.mp4 | 8/29/22 14:37 EDT | Combustor #2/2 of the South combustor set                |