

**Arkoma Operations LLC- Helton Well Pad
Full Compliance Evaluation (FCE)
On-Site Clean Air Act (CAA) Inspections**

Inspection Date: June 27, 2022

Inspection Report Date: July 21, 2022

EPA Representatives: Alexis North

Tribal Representatives: David Heermance, Meredith Breeden, Drew Switzer

Company Representatives: None onsite during inspection.

Inspection Report Prepared By: Alexis North

Inspection Report Reviewed By: Scott Patefield

Applicable Rules: None

**SCOTT
PATEFIELD** Digitally signed by
SCOTT PATEFIELD
Date: 2022.10.04
10:48:50 -06'00'

Compliance Assistance

None

Enforcement History

This facility has never been inspected and has no prior enforcement history.

Area of Concern

None

General Source Information

An unannounced inspection was conducted on June 27, 2022, at the Helton well pad owned and operated by Arkoma. For reference, these wells are co-located on the same pad as the Slugger well pad owned and operated by Advanced Wireless Communication. Inspectors scanned the well sites' liquid storage tank for any detectable emissions using an optical gas imaging (OGI) camera.

Table 1 lists well pad specifics for each inspection including latitude/longitude location and entry/exit details.

Table 1: List of Facilities Inspected June 27, 2022

Well Name	Latitude	Longitude	Date	Time In	Time Out
Helton #1A (API 05 067 08175) V.D. Helton #1 (API 05 067 05749)	37.10752	-107.75419	6/27/2022	3:15 pm	Not reported

Tables 2 and 3 at the end of this report includes the inspections details. Table 2 includes well head counts and storage details. Table 3 contains control device and audio, visual, or olfactory (AVO) details. Each well pad inspection followed the approach below:

1. Park on the wellpad.
2. Make notations on the site operation including the number of each major type of site process equipment present (e.g., total number of tanks, number of oil tanks, number of water tanks, number of tank emission control devices).
3. Note any AVO indications of emissions from the tanks, closed vent system, and control devices.
4. Survey the site operations in infrared modes (auto, manual, and/or high-sensitivity modes), looking for emissions.

CAA Applicability

As an oil and gas well site, there could be NSPS OOOO or OOOOa applicability. However, this field is producing methane from coalbed methane seams and there is no condensate production/storage at this facility, thus will not trigger the 6 tons per year VOC threshold for NSPS OOOO/a applicability.

Additionally, EPA has no NSPS OOOO/a reports from Arkoma Operations indicating applicability.

While the Tribal Minor NSR Oil and Gas registration program applies to all facilities operating on the Southern Ute Reservation above certain pollutant thresholds (5 tons VOC in an attainment area), there are no Part 2 registrations for these facilities.

There are no natural gas powered pumping engines operating on the two Helton wells, thus no NSPS JJJJ or MACT ZZZZ applicability.

No information regarding the 2 newer Slugger wells could be located in Colorado Oil and Gas database (COGIS), see screen shot below link [here](#):

COGIS - Related Facilities

Facility Type	Facility ID/ API	Facility Name/ Number	Operator Name/ Number	Status	Field Name/ Number	Location	Location ID
LOCATION	311904	V D HELTON-N33NBW 18CNE	ARKOMA OPERATIONS LLC 10766	AC 5/1/2022	IGNACIO BLANCO 38300	LA PLATA 067 CNE 18 33NBW N	311804

Related Results

For detail information: Click on facility type.

Search Results - 4 record(s) returned.						
Facility Type	Facility ID/ API	Facility Name/ Number	Operator Name/ Number	Status	Field Name/ Number	Location
PIT	115028	HELTON 1	ARKOMA OPERATIONS LLC 10766	9/23/1999	IGNACIO BLANCO 38300	LA PLATA 067 CNE 18 33NBW
LOCATION	311904	V D HELTON-N33NBW 18CNE	ARKOMA OPERATIONS LLC 10766	AC 5/1/2022	IGNACIO BLANCO 38300	LA PLATA 067 CNE 18 33NBW
WELL	05-067-05749	V D HELTON 1	ARKOMA OPERATIONS LLC 10766	SI 5/1/2022	IGNACIO BLANCO 38300	LA PLATA 067 CNE 18 33NBW
WELL	05-067-08175	HELTON 1A	ARKOMA OPERATIONS LLC 10766	PR 1/15/1999	IGNACIO BLANCO 38300	LA PLATA 067 NENE 18 33NBW

Related Samples

Search Results - No records found

Google Earth Image:

The two Arkoma wells are located in the red circle below, the co-located Advanced Wireless Communications wells are outside the red circle.



Photo and Video Log

Date	File	Name	Comment	
6/27/2022	DC_2975.jpg	Slugger/Helton Pad	Pic of well sign	
6/27/2022	DC_2976.jpg	Slugger/Helton Pad	Pic of well sign	

Table 2: Inspection Details: Well Head Count and Storage Tanks

Well Name	# Well Heads (WH)	# WH Operating?	# Total Storage Tanks	Vapor Recovery Tower?	CVS IR?	File ID	Tank Thief IR?	File ID
Helton #1A (API 05 067 08175) V.D. Helton #1 (API 05 067 05749)	2	2	1	None	None		None	

Table 3: Inspection Details: Control Devices and AVO

Well Name	Combustion Device (CD) Type	CD Count	Visible flame CD?	UBHC ?	CD IR?	File ID	Smoke from CD?	AVO	Notes
Helton #1A (API 05 067 08175) V.D. Helton #1 (API 05 067 05749)	None	0	NA	NA	NA	NA	NA	No odors	No condensate collected on site, only water. Wells produce dry, coalbed methane. AN

*UBHC = unburned hydrocarbons