



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

DATE: JUN 05 2019

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Ascent Resources – Grywalski Well Pad, Dillonvale, Ohio

FROM: Natalie Topinka, Environmental Scientist
AECAB (IL/IN)

THRU: Nathan Frank, Section Chief
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: Ascent Resources – Grywalski Well Pad

Facility Location: 40.198638, -80.829331, Dillonvale, Ohio

Date of Inspection: April 17, 2019

EPA Inspectors:

1. Natalie Topinka, Environmental Scientist
2. Victoria Nelson, Environmental Engineer
3. Constantinos Loukeris, Environmental Engineer

Other Attendees

1. Jon Hickman, EH&S Supervisor – Environmental, Ascent
2. Rob Messier, contractor to Ascent
3. Randy Moore, Ascent

Contact Email Address: jon.hickman@ascentresources.com

Purpose of Inspection: to assess compliance with requirements of NSPS Subpart OOOO and facility PTIO

Facility Type: oil and natural gas well pad

Regulations Central to Inspection: New Source Performance Standards (NSPS) Subpart
OOOO

Arrival Time: 3:10 pm

Departure Time: 4:25 pm

Inspection Type:

- ☐ Unannounced Inspection
- ☒ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Ascent representatives unless otherwise noted.

Process Description:

At the well pad, an oil/gas/water emulsion is extracted from the formation through wells on-site. The emulsion from each well goes to a separator, from which the gas is sent to the sales line and the liquids are piped to separate 400-barrel, atmospheric pressure, fixed-roof tanks on-site. The vapors from the tank headspaces are piped together and to a combustor for destruction. Each tank has a "thief" hatch on top for gaining access to the liquid when necessary. The thief hatches are set to relieve pressure should the pressure due to flashing, working, or breathing emissions from the liquids contained within the tanks get too high for the piping of the vapor capture system and combustor to accommodate.

Staff Interview: The Grywalski well pad was a brand-new well pad constructed by Ascent, and was in flowback stage at the time of our inspection. Our inspection occurred on the 8th day of the second round of flowback for this well pad. The wells are considered "dry" and so no condensate tanks will be present onsite when production begins. Prior to the flowback stage is "unloading." During unloading, water is extracted from the well at a consistent rate until gas becomes present in the wellstream. At that point, the well is shut in and the flow is switched to separation equipment to divert gas to the sales line. During flowback, the flow is split between temporary and permanent equipment in order to lessen the wear and tear on the permanent equipment. Water from the separator goes to temporary tanks which do not have emissions controls. At the time of our inspection, a portion of the produced water was also going to the permanent water storage tanks.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

We observed near-continuous emissions from the pressure relief devices atop the permanent water tanks.

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

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

Requested documents:

We requested the following documents, and summarized via e-mail on April 23, 2019:

- Ascent's flow chart for its LDAR program (i.e. chain of responsibility and procedures/tasks).
- Records of LDAR/FLIR surveys, repairs, and follow-up verifications conducted at Ascent's Foxtrot well pad since its acquisition from Hess.
- A repair log (date/FLIR verification) for the items (i.e. weighted hatches, conservation vents, vacuum breakers, and threaded connections) EPA noted to be emitting during our inspections on April 16-17, 2019.
- A copy of the spec sheet for the combustor installed at the Grywalski well pad.

We also requested feedback on the following additional topics we discussed for consideration:

- Explore using existing pressure gauges on tank vapor space to inform operators of what sort of conditions the tanks undergo throughout dump cycles and in a variety of temperature conditions. The pressure data could be used to inform operators of what kinds of stress the pressure/vacuum relief devices experience, and potential options for alleviating that stress to prevent emissions/leaks. Would Ascent consider installing pressure gauges on existing tank batteries, or include them in the design of new well pads pending construction?
- Assess the gasket material on every tank hatch that was acquired from Hess, and switch out to known higher-performing material if not done so yet.
- How are VOC emissions that occur from BTEX condenser vents on dehy equipment (e.g. what was observed on the Ace pad) tracked and accounted for?

Ascent responded via e-mail on May 9, 2019.

Compliance Assistance: We discussed the items listed above as ways to inform continuous improvement of Ascent's operations and LDAR program. We discussed the importance of ensuring that combustors were properly sized for all stages of production at a well pad.

Concerns: Where we detected emissions with the FLIR camera, we shared our observations with Ascent personnel.

SIGNATURES

Report Author: Natali Pri Date: 5/30/19

Section Chief: [Signature] Date: 6/5/19

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APPENDICES AND ATTACHMENTS

1. Digital image/video log
2. Digital images and videos on CD

Facility Name: Ascent Resources – Grywalski Well Pad
Facility Location: 40.198638, -80.829331, Dillonvale, Ohio
Date of Inspection: April 17, 2019

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Natalie Topinka	2. Date(s) of Inspection: April 17, 2019
3. Company/Facility Name: Ascent Resources – Grywalski Well Pad	4. Street Address, City, State: 40.198638, -80.829331, Dillonvale, Ohio
5. Number of Images: 2	6. Archival Record Location: CD-R labeled “Ascent Resources – Grywalski Well Pad – Inspection photos/video 4/17/19”

Image Number	File Name	Date	Description of Image
1	IMG_010.jpg	4/17/19	Wide-angle view of site
2	MOV_2317.mp4	4/17/19	Near-continuous emissions from PRV on permanent produced water tanks