



REGION 8

DENVER, CO 80202

Hess Corporation – Various Well Pads Partial Compliance Evaluation (PCE) On-Site Clean Air Act (CAA) Inspections

Inspection Date(s): October 22, 2024

Inspection Report Date: December 27, 2024

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

North Dakota Division of Russel Martin, Inspector
Air Quality Representatives: Myles Erb, Inspector

Company Representatives: None

Inspection Report Prepared Katelyn Bergl
By: Youn Joo Kim

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

SCOTT PATEFIELD Digitally signed by SCOTT PATEFIELD
Date: 2024.12.27 15:09:47 -07'00'

Applicable Rules: North Dakota Administrative Code, Title 33.1, Article 15, as incorporated into North Dakota's EPA-approved State Implementation Plan at 40 C.F.R. Part 52, Subpart JJ – North Dakota (ND SIP), including the following chapters:

- Chapter 7, Control of Organic Compound Emissions (ND SIP Chapter 7);
- Chapter 12, Standards of Performance for New Stationary Sources (ND SIP Chapter 12); and
- Chapter 20, Control of Emissions from Oil and Gas Well Production Facilities (ND SIP Chapter 20)

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

Compliance Assistance

None

Enforcement History

None

Areas of Concern

None

General Inspection Information

Unannounced well pad inspections were conducted jointly by U.S. EPA and North Dakota Department of Environmental Quality – Division of Air Quality inspectors (Inspectors) on October 22, 2024, at multiple Hess Corporation facilities located in North Dakota.

The 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 North Dakota SIP 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(s)	Latitude	Longitude
10/22/24	12:31	12:39	AN-Dinwoodie E Pad	3305307690 3305307691 3305307692 3305307895	48.0499925	-102.76491
10/22/24	12:44	12:47	AN-Bohmbach 44-98 Facility	3305303305 3305304230 3305304322 3305304323 3305304324	48.0524464	-102.7523

Tables 2 and 3 below summarize inspection observations. Table 2 summarizes storage tank observations. Table 3 includes details of control devices and related observations. See Appendix A for a log of images and videos taken during the inspections.

Table 2: Inspection Details: Storage Tank Observations				
Well Pad Name	Number of Storage Tanks	AVO (Audio, visual, olfactory) Observations	Emissions Description	Media File Name
AN-Dinwoodie E Pad	18	—	—	—
AN-Bohmbach 44-98 Facility	0	—	—	—

Table 3: Inspection Details: Control Devices and AVO/OGI Observations						
Well Name	Number of Control Device(s)	Control Device Type(s)	Visible Pilot Flame (Y/N)	Active Flaring (Y/N)	Method 22 Observations	Emission Description
AN-Dinwoodie E Pad	1	Air Assisted Steffes	Y	N	None	—
AN-Bohmbach 44-98 Facility	2	HP	Y	N	None	—
		HP	Y	N	None	—

APPENDIX A: Photograph and Video Log

Media File	Description	Well Pad Name
entrysign-20241022-173318.jpg	Entry Sign	AN-Dinwoodie E Pad
entrysign-20241022-174523.jpg	Entry Sign	AN-Bohmbach 44-98 Facility

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
RESOURCE CONSERVATION AND RECOVERY ACT**

BASIC INFORMATION

Facility Name: 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

RCRA ID: UTR00014795

Facility Contact: CJ Nebeker, 435-823-1144,
cjnebeker@yahoo.com

Notification Status: Non-notifier

Date of Inspection: July 9, 2024

Arrival Time: 9:14 a.m.

Departure Time: 6:20 p.m.

Lead Inspector: Annette Maxwell, U.S. EPA

Other Attendees:

1. CJ Nebeker, Brennan Bottom Disposal (BBD)
2. Matt Lewis, BBD
3. Craig Obermeuller, BBD
4. Don Demille, BBD
5. Jason Obermeuller, BBD
6. Jeremy Obermeuller, BBD
7. Tara Hubner, EPA R8 LCRD
8. Jesse Newland, EPA R8 LCRD
9. Rob Beierle, EPA R8 LCRD
10. Bill Schroeder, EPA R8 LSASD
11. CeeJay Rebsom, Ute Indian Tribe, Environmental
12. Neil Rapp, EPA Contractor (ERG)
13. George Wieber, EPA Contractor (ERG)
14. Andrew Swinger, EPA Contractor (ERG)

Type and Purpose of Inspection: Compliance Evaluation Inspection and Compliance Schedule Evaluation (CSE)

Facility Type: Commercial Oilfield Waste Disposal Facility (COWDF)

Applicable Statute to Inspection: RCRA Section 7003

Inspection Detail: -Announced Inspection
-Facility located within the exterior boundaries of the Uintah & Ouray
Reservation

FACILITY INFORMATION

Company Operator: Brennan Bottom Disposal, LLC

Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Additional Information: An amended RCRA administrative order on consent (AOC), Docket RCRA-08-2020-0001, was issued by the EPA on November 21, 2019, to address concerns related to findings from an October 22, 2018, inspection. This AOC remained in effect at the time of this inspection.

General Facility and Process Description: The Brennan Bottom Disposal 12 Mile Wash facility is a commercial oilfield waste disposal facility that receives non-hazardous, RCRA Subtitle C-exempt E&P oilfield waste for storage, handling and disposal. The facility includes seven evaporation ponds, two landfills converted from previous evaporation ponds, a netted open-top multi-cell settling vault, a landfarm, a centrifuge, and four tank battery areas.

A site map is included in Attachment 1 – Site Map.

REPORT SCOPE

The scope of this report is limited to observations and/or concerns regarding potential for impact to the environment as may be related to RCRA Section 7003, including potential for harm to wildlife. Sampling activities conducted under RCRA Section 3007 that occurred during the inspection were beyond the scope of this report. For that sampling activity, the sample results will be provided by the EPA when they become available.

TOUR INFORMATION

Upon arrival at the facility, an opening conference was held with Mr. Nebeker, during which I presented my inspector credentials.

Areas of the facility toured:

- Evaporation ponds
- Settling Vault
- Storage tank battery areas
- Centrifuge
- Landfarm

Data Collected and Observations:

Photos collected as part of this inspection are included in Attachment 2 – Photo Log.

During the inspection, Mr. Nebeker provided an overview of facility operations. In regard to three condensate tanks located near the site entrance, he said that sellable material is drawn from the condensate tanks, with waste material settling to the bottoms. For truck unloading of waste, he said that occurs at the headworks, which consists of a four-bin settling system controlled by valves. In regard to Pond 1, he said that it is promptly skimmed if oil is observed on its surface, and that booms are used to corner hydrocarbons for collection. To prevent oil flowing to Pond 1, the vault

Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

bins are cleaned as needed, sometimes two times per month, sometimes one time every couple of months. Another preventive measure is instructing truck drivers to stop collecting into the truck if they start getting oil to try to limit the amount of oil coming into the headworks. Slop oil stored in the preheat tanks near the site entrance are routed to the centrifuge.

In regard to pond levels, Mr. Nebeker said that as Pond 1 fills up, the contents are pumped to the next pond. Typically, Pond 1 is routed to Pond 3 or pond 5, which can then be routed to Pond 6 or Pond 7, then Pond 8 or Pond 9. Ponds 2 and 4 have been converted to landfills. Mr. Lewis said there are two centrifuges now, run one at a time, and the possibility that they could later run both at the same time in the future. For maintenance, Mr. Nebeker said each centrifuge is taken out of service and shipped to Houston annually. For the centrifuge process, he said polymer, emulsifiers and toluene plus heat are used to separate oil from waste. He also said that drilling mud is no longer accepted at the facility.

During the site walk-through, at the settling vault (a.k.a. headworks), I observed that the netting was in good condition. See Attachment 2, photo 6.

At Pond 1, I observed a small amount of oil floating on the surface at the northwest corner of the pond, Attachment 2, photos 7-9.

At Landfill 2, I observed that only a small amount of liquid was present on the surface of the landfill. The liquid appeared to potentially be due to previous precipitation and did not appear to be the result of liquid waste disposal. See Attachment 2, photos 10-15.

At Landfill 1, I observed no indication of liquid or standing oily waste on the surface of the landfill. See Attachment 2, photos 18-25 and 31-33. I also did not observe any liquid or standing oily waste on the surface of the landfarm, see Attachment 2, photos 26-30.

At Pond 9, I observed erosion on the south side of the pond. See Attachment 2, photos 39 and 40. Mr. Nebeker said they would get it repaired promptly.

I did not observe spills of oily waste at the facility. Apart from the small amount of oil along the edge of the northwest corner of Pond 1, I did not observe oily waste that was physically unrestricted from access by wildlife. No bird or other wildlife mortalities were observed in any areas of the facility that were inspected.

CLOSING CONFERENCE

A closing conference was conducted with Mr. Nebeker before the end of the inspection, during which I told them that an inspection report would be provided.

Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

SIGNATURE ANNETTE

Inspector: MAXWELL

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MAXWELL
Date: 2024.12.12 16:58:54 -07'00'

Annette Maxwell, RCRA Inspector

KRISTIN MCNEILL

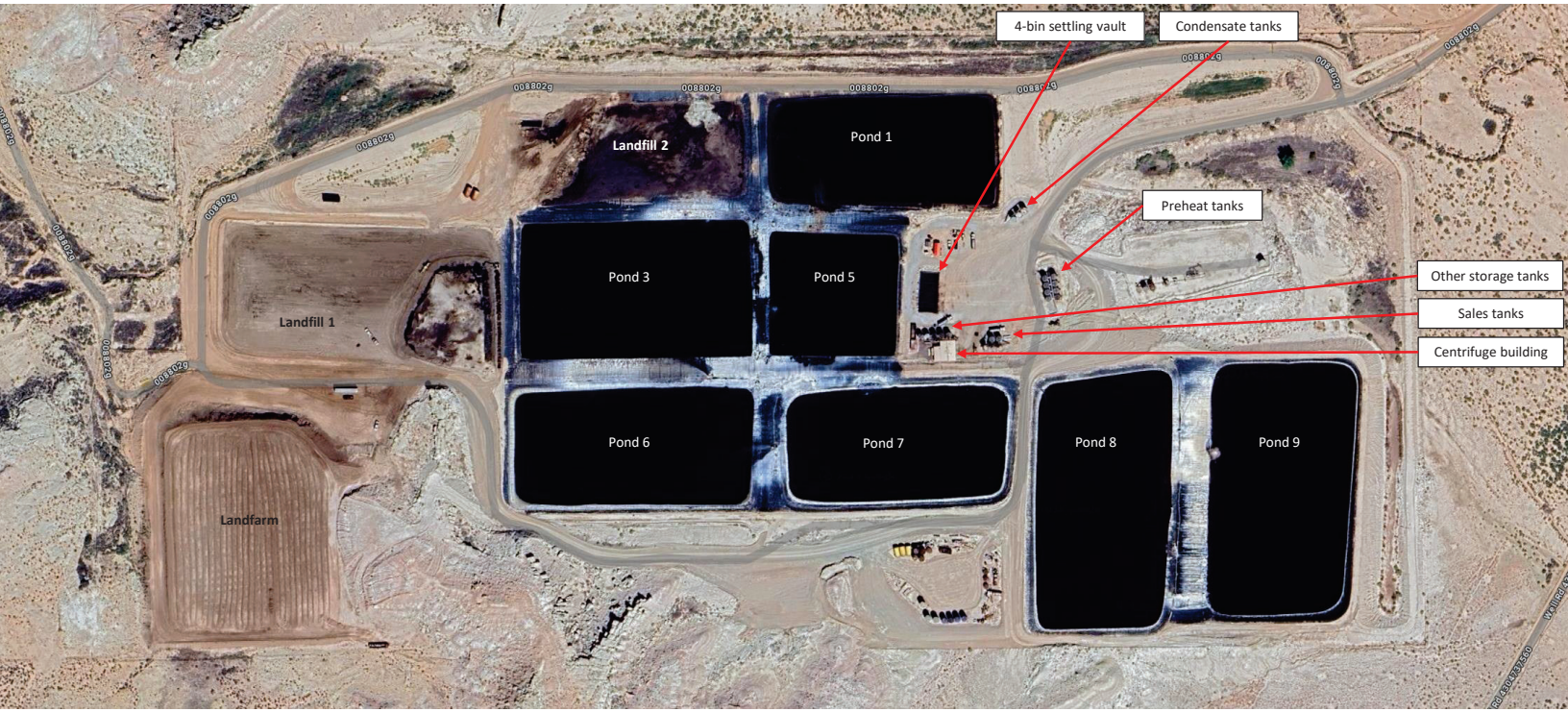
Supervisor:

Digitally signed by KRISTIN
MCNEILL
Date: 2025.01.10 08:49:48 -07'00'

for Sri Susarla, Manager
RCRA and OPA Enforcement Branch
Enforcement and Compliance Assurance Division

Attachment 1 – Site Map

BBD 12 Mile Wash COWDF



Attachment 2 – Photo Log

Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

ATTACHMENT 2 – PHOTO LOG

Photographer: Annette Maxwell

Camera Model and ID: iPad, SS8392

Photo 1: IMG_0149.jpg, 7/9/2024 9:55 a.m. – photo of eight preheat tanks.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 2: IMG_0150.jpg, 7/9/2024 9:55 a.m. – photo of four sales tanks and one freshwater tank.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 3: IMG_0151.jpg, 7/9/2024 10:56 a.m. – photo of three condensate tanks.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 4: IMG_0152.jpg, 7/9/2024 10:56 a.m. – site overview from vicinity of facility entrance.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 5: IMG_0153.jpg, 7/9/2024 10:56 a.m. – photo of the same area shown in photo 4, panned left.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 6: IMG_0154.jpg, 7/9/2024 10:58 a.m. – photo of the slop/skim vault.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 7: IMG_0155.jpg, 7/9/2024 11:16 a.m. – photo of Pond 1 taken from the northwest corner.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 8: IMG_0156.jpg, 7/9/2024 11:16 a.m. – photo panned right from photo 7.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 9: IMG_0157.jpg, 7/9/2024 11:17 a.m. – photo of Pond 1, with a discoloration at the edge of the pond that appeared to potentially be a small amount of oil near the northwest corner of the pond.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 10: IMG_0158.jpg, 7/9/2024 11:19 a.m. – photo of Landfill 2, taken from the northeast corner.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 11: IMG_0159.jpg, 7/9/2024 11:19 a.m. – photo of Landfill cell 2, panned left from photo 10.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 12: IMG_0160.jpg, 7/9/2024 11:39 a.m. – photo of Landfill 2 facing south/southeast toward the eastern end of the landfill.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 13: IMG_0161.jpg, 7/9/2024 11:39 a.m. – photo of Landfill 2, panned right from photo 12.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 14: IMG_0162.jpg, 7/9/2024 11:39 a.m. – photo of Landfill 2, panned right from photo 13.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 15: IMG_0163.jpg, 7/9/2024 11:44 a.m. – photo of Landfill 2 from the southwest corner facing northeast.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 16: IMG_0164.jpg, 7/9/2024 11:44 a.m. – photo of Pond 3, with Landfill 2 visible at the far left.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 17: IMG_0165.jpg, 7/9/2024 11:44 a.m. – photo of Pond 3 panned right from photo 16.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 18: IMG_0166.jpg, 7/9/2024 11:48 a.m. – photo of Landfill 1, taken from the southeast corner facing north toward the eastern end of the Landfill 1.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 19: IMG_0167.jpg, 7/9/2024 11:48 a.m. – photo of Landfill 1 panned left from photo 18.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 20: IMG_0168.jpg, 7/9/2024 11:48 a.m. – photo of Landfill 1 panned left from photo 19.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 21: IMG_0169.jpg, 7/9/2024 11:53 a.m. – photo of Landfill 1 facing northwest toward the southwest corner of the landfill.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 22: IMG_0170.jpg, 7/9/2024 11:53 a.m. – photo of Landfill 1 panned right from photo 21.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 23: IMG_0171.jpg, 7/9/2024 11:53 a.m. – photo of Landfill 1 panned right from photo 22.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 24: IMG_0172.jpg, 7/9/2024 11:53 a.m. – photo of Landfill 1 panned right from photo 23.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 25: IMG_0173.jpg, 7/9/2024 11:53 a.m. – photo of Landfill 1 panned right from photo 24.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 26: IMG_0174.jpg, 7/9/2024 12:00 p.m. – photo of the landfarm taken on the south side, near the southwest corner, facing east/northeast.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 27: IMG_0175.jpg, 7/9/2024 12:00 p.m. – photo of the landfarm panned left from photo 26.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 28: IMG_0176.jpg, 7/9/2024 12:00 p.m. – photo of the landfarm panned left from photo 27.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 29: IMG_0177.jpg, 7/9/2024 12:00 p.m. – photo of the landfarm panned left from photo 28.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 30: IMG_0178.jpg, 7/9/2024 12:00 p.m. – photo of the landfarm panned left from photo 29.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 31: IMG_0179.jpg, 7/9/2024 12:06 p.m. – photo of Landfill 1.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 32: IMG_0180.jpg, 7/9/2024 12:06 p.m. – photo of Landfill 1, panned right from photo 31.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 33: IMG_0181.jpg, 7/9/2024 12:06 p.m. – photo of Landfill 1, panned right from photo 32, with evaporation ponds visible in the background.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 34: IMG_0182.jpg, 7/9/2024 12:44 p.m. – photo of the open-top centrifuge solids collection bin located beneath the centrifuge.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 35: IMG_0183.jpg, 7/9/2024 1:06 p.m. – photo of Pond 8, taken from the south side of the pond facing north/northwest.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 36: IMG_0184.jpg, 7/9/2024 1:06 p.m. – photo of Pond 8, panned right from photo 35.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 37: IMG_0185.jpg, 7/9/2024 1:06 p.m. – photo of Pond 8, panned right from photo 36.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 38: IMG_0186.jpg, 7/9/2024 1:06 p.m. – photo of Pond 8, panned right from photo 37.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 39: IMG_0187.jpg, 7/9/2024 1:11 p.m. – photo of erosion south of Pond 9.



Facility Name: Brennan Bottom Disposal 12 Mile Wash COWDF

Facility Location: 40.278941, -109.60297

Date of Inspection: July 9, 2024

Photo 40: IMG_0188.jpg, 7/9/2024 1:11 p.m. – photo of the same erosion shown in photo 39.

