



REGION 8

DENVER, CO 80202

**White Rock Oil & Gas, LLC - Various Well Pads and Facilities
Partial Compliance Evaluation (PCE)
On-Site Clean Air Act (CAA) Inspections**

Inspection Date(s): October 23, 2024

Inspection Report Date: December 5, 2024

EPA Representatives: US EPA Region 8 Clean Air Act Inspectors: Alexis North, Joe Wilwerding, Bob Gallagher

State Representatives: Jamin Grantham, Adam Bradley, Saloma Lentz

Company Representatives: Shawna Bonini. Spencer Learherman, Daniel Heggem

Inspection Report Prepared By: Alexis North, Joe Wilwerding

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

Related Rules: Administrative Rules of Montana, Title 17 Environmental Quality, Chapter 8 ([link](#))

SCOTT PATEFIELD
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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

40 C.F.R Part 60, Subpart OOOOa: Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 (NSPS OOOOa)

Compliance Assistance

None

Areas of Concern

1. The EPA detected hydrocarbon emissions from the storage tanks at well pads co-located with the following wells:
 - Steinbeisser 44 32 H
2. The EPA detected hydrocarbon emissions from an unlit flare co-located with the following wells or compressor sites:
 - Christiansen 14X 9
 - Lowell Larson
 - Steinbeisser 44 32 H
3. The EPA detected unburned hydrocarbon (UBHC) emissions from operating utility flares co-located with the following wells:
 - None
4. The EPA detected visible emissions from operating utility flares co-located with the following wells:
 - None

See Table 1 below for more details regarding inspected locations and Tables 3 and 4 for inspection observation details for all pads. A log of images and videos captured during the inspections is provided in Appendix A.

General Inspection Information

Announced well pad inspections were conducted jointly by U.S. EPA and Montana State inspectors on October 23, 2024, at multiple White Rock Oil & Gas, LLC (White Rock) facilities located in the Northeast portion of the State of Montana.

The EPA 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 Administrative Rules of Montana and NSPS OOOO/a.

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, 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 facility details for each inspected facility. The well pad information located in the Table 1 is from the Montana Board of Oil and Gas online data base located at <https://bogapps.dnrc.mt.gov/dataminer/Production/ProductionByWell.aspx>.

Table 1: Inspection and Facility Details of Facilities Inspected				
Date	Facility Name	API Well ID	Latitude	Longitude
10/23/2024	Christiansen 14X 9	25083222870000	-104.288	47.76217
10/23/2024	Larson 8 28	25083222680000	-104.272	47.72737
10/23/2024	Lowell Larson	25083222030000	-104.269	47.73769
10/23/2024	Larson 44x 18	25083220140000	-104.316	47.74873
10/23/2024	Larson 3 19h	25083223010000	-104.326	47.7447
10/23/2024	Rocky 42x 13	25083228290000	-104.338	47.75524
10/23/2024	Obergfell Trust and Nancy Lee	25083221570000, 25083226480000	-104.356	47.7529
10/23/2024	Larson 1 19h	25083224870000	-104.319	47.74598
10/23/2024	Steinbeisser 44 32 H	25083222130000	-104.426	47.70612
10/23/2024	Simonsen 44x 5	25083223810000	-104.164	47.68953
10/23/2024	Groskinsky 44x6	25083224190000	-104.186	47.68934

Observations and Regulatory Applicability

The Administrative Rules of Montana and NSPS OOOO/a regulations which are potentially relevant to the observations noted during the inspections are summarized in this section.

Administrative Rules of Montana Applicability

The following emissions control requirements apply to the White Rock facilities inspected by EPA and the State of Montana:

17.8.1603 Emission Control Requirements

Per 17.8.1603(1)(b), “VOC vapors greater than 500 BTU/scf from oil and condensate storage tanks with the PTE of 15 TPY or greater must be captured and routed to a gas pipeline, or if a gas pipeline is not located within a 1/2 mile of the oil and gas well facility, VOC vapors greater than 500 BTU/scf from storage tanks with the PTE of 15 TPY must be captured and routed to emissions minimizing technology, or to a smokeless combustion device equipped with an electronic ignition device or a continuous burning pilot system.”

17.8.1710 Oil or Gas Well Facilities General Requirements

Per 17.8.1710(3), “(3) The owner or operator of a registered oil or gas well facility shall operate all emissions control equipment to provide the maximum air pollution control for which it was designed.”

17.8.1711 Oil or Gas Well Facilities Emission Control Requirements

Per 17.8.1711(1)(a), “VOC vapors of 200 Btu/scf or greater from each piece of oil or gas well facility equipment, with a PTE greater than 15 tpy, must be captured and routed to a gas pipeline, routed to a smokeless combustion device equipped with an electronic ignition device or a continuous burning pilot system, meeting the requirements of 40 CFR 60.18, and operating at a 95% or greater control efficiency, or routed to air pollution control equipment with equal or greater control efficiency than a smokeless combustion device. The phrase "oil or gas well facility equipment" includes, but is not limited to, wellhead assemblies, amine units, prime mover engines, phase separators, heater treatment units, dehydrator units, tanks, and connecting tubing, but does not include equipment such as compressor engines used for transmission of oil or natural gas”.

NSPS OOOO/a Applicability

EPA assembled data on well production information reported to the Montana Board of Oil and Gas in Table 2, in order to determine if compliance with NSPS Subparts OOOO/a is required at the inspected sites. As shown in Table 2, each of the sites started production (and was therefore constructed) prior to the August 23, 2011 initial applicability date for NSPS Subpart OOOO. Also, no additional wells have been added to the sites since original construction.

Table 2: Site First Date of Operation and Other Information		
Facility Name	First Date of Oil Production	Date of Any Well Additions
Christiansen 14X 9	3/1/2006	N/A
Larson 8 28	5/1/2005	N/A
Lowell Larson	12/1/2004	N/A
Larson 44x 18	11/1/2003	N/A
Larson 3 19h	12/1/2005	N/A
Rocky 42x 13	8/1/2010	N/A
Obergfell Trust and Nancy Lee	7/1/2004	N/A
Larson 1 19h	8/1/2006	N/A
Steinbeisser 44 32 H	1/1/2005	N/A
Simonsen 44x 5	3/1/2006	N/A
Groskinsky 44x6	5/1/2006	N/A

Tables 3 and 4 below summarize inspection observations and findings. Table 3 includes facility storage tank information and observations. Table 4 includes details of control devices and related observations. See Appendix A for a log of images and videos taken during the inspections.

Table 3: Inspection Details: Storage Tank Observations			
Facility Name	Number of Storage Tanks	AVO (Audio, visual, olfactory) Observations	Emissions/Observation Media File Name
Christiansen 14X 9	3	No emissions/AVO; pumper pulling load of water finished while onsite.	
Larson 8 28	4	No liquid levels in tanks; IR clear.	
Lowell Larson	2	No emissions from tanks noted.	
Larson 44x 18	3	Site not operating; not connected.	
Larson 3 19h	4	Site not operating.	
Rocky 42x 13	4	No emissions noted.	
Obergfell Trust and Nancy Lee	8	No emissions noted.	
Larson 1 19h	4	No emissions noted.	
Steinbeisser 44 32 H	5	Saw emissions from far-left crude tank this morning, but emissions were gone when we returned to site this afternoon. As we were leaving in the afternoon, we checked the tanks one last time and the venting was back on the far-left crude oil tank. White Rock stopped the emissions while we were still onsite.	MOV_3627, MOV_3628
Simonsen 44x 5	4	No emissions from tanks noted.	
Groskinsky 44x6	4	No emissions from tanks noted.	

Table 4: Control Devices and Related Observations						
Facility Name	Flare 1 Type	Quantity of Flare 1 Type	Flare 2 Type	Quantity of Flare 2 Type	Combustion Control Device Notes	Emissions/Observation Media File Name
Christiansen 14X 9	Pit	1			Pit flare sparking, but not igniting. Can hear sparking. Video taken of emissions. Flare caught while I was standing there; video taken.	MOV_3615, MOV_3616
Larson 8 28	Steffes	1			No emissions noted.	

Table 4: Control Devices and Related Observations						
Facility Name	Flare 1 Type	Quantity of Flare 1 Type	Flare 2 Type	Quantity of Flare 2 Type	Combustion Control Device Notes	Emissions/ Observation Media File Name
Lowell Larson	Cimmaron	1	Steffes	1	Steffes flare on and operating. Cimarron unlit and venting upon arrival.	MOV_3619
Larson 44x 18	Pit	1			Site not operating.	
Larson 3 19h	Pit	1			Site not operating.	
Rocky 42x 13	Pit	1			Pit flare operating with visible flame.	
Obergfell Trust and Nancy Lee	Pit	1			Pit flare operating.	
Larson 1 19h	High Pressure Steffes	1	Cimarron	1	Steffes visible flame; Cimarron on no emissions noted.	
Steinbeisser 44 32 H	Pit	1			Pit flare venting; spark not catching. As soon as wind died down a bit, flare ignited. Need to reconfigure flare to catch spark in windy conditions. Sales gas not being sold so going out of unlit flare for a period of time today.	MOV_3626
Simonsen 44x 5	Pit	1			Flare flame visible.	
Groskinsky 44x6	Pit	1			Pit flare was operating and sales gas flaring started while we were onsite.	

APPENDIX A: Photograph and Video Log

Media File	Site	Description
IMG_0030	White Rock Christiansen 14X-9	Sign
IMG_0031	White Rock Larson 44x 18	Sign
IMG_0032	White Rock Rocky 42x 13	Sign
IMG_0033	White Rock Obergfell Trust and Nancy Lee	Sign
IMG_0034	White Rock Obergfell Trust and Nancy Lee	Lit pit flare
IMG_0035	White Rock Steinbeisser 44 32 H	Sign
MOV_3611	White Rock Steinbeisser 44 32 H	Tank emissions far left tank
MOV_3612	White Rock Facility	Site scan from car
MOV_3614	White Rock Christiansen 14X-9	Site video
MOV_3615	White Rock Christiansen 14X-9	Emissions from unlit pit flare
MOV_3616	White Rock Christiansen 14X-9	Lit pit flare
MOV_3617	White Rock Larson 8 28	Site video
MOV_3618	White Rock Lowell Larson	Site video
MOV_3619	White Rock Lowell Larson	Uncombusted emissions from enclosed combustor
MOV_3620	White Rock Larson 44x 18	Site video
MOV_3621	White Rock Larson 3 19h	Site video
MOV_3622	White Rock Rocky 42x 13	Site video
MOV_3623	White Rock Obergfell Trust and Nancy Lee	Site video
MOV_3624	White Rock Larson 1 19h	Site video
MOV_3625	White Rock Steinbeisser 44 32 H	Site video
MOV_3626	White Rock Steinbeisser 44 32 H	Unlit pit flare
MOV_3627	White Rock Steinbeisser 44 32 H	Tank with no emissions
MOV_3628	White Rock Steinbeisser 44 32 H	Tank with no emissions
MOV_3629	White Rock Simonsen 44x 5	Site video
MOV_3630	White Rock Groskinsky 44x6	Site video
MOV_3631	White Rock Groskinsky 44x6	Pit flare lighting