



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

JUN 04 2019

DATE:

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Utica Resource Operating, LLC – Garvin Well Pad, Wills Township, Ohio

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

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

TO: File

BASIC INFORMATION

Facility Name: Utica Resource Operating, LLC – Garvin Well Pad

Facility Location: 39.56399, -81.5081, Wills Township, Ohio

Date of Inspection: April 18, 2019

EPA Inspectors:

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

Other Attendees:

1. Maureen Kertes, EHS Professional, URO
2. Shannon Thompson, KC Harvey

Contact Email Address: mkertes@uticaresource.com

Purpose of Inspection: To assess compliance with NSPS Subpart OOOO and the facility's PTIO

Facility Type: Oil and natural gas well pad

Regulations Central to Inspection: NSPS Subpart OOOO

Arrival Time: 4:16 PM ET

Departure Time: 4:40 PM ET

Inspection Type:

- ☐ Unannounced Inspection
- ☒ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Ms. Kertes unless otherwise noted.

Company Ownership: This well pad, along with 10 others in Ohio, was constructed and formerly owned and operated by PDC Energy. Utica Resource Operating, LLC acquired the facilities in early 2018.

Process Description:

At the well pad, an oil/gas/water emulsion is extracted from the formation through three wells, located near the Garvin well pad. The emulsion from each well goes to a separator, from which the gas is sent to the sales line and the oil and water are piped to a tank battery with separate 400- or 500-barrel, atmospheric pressure, fixed-roof tanks on-site. The tank battery is made up of six tanks and was connected to three low pressure towers. 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: URO recently received a license for ProMax software to begin modeling emissions from well pads.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

From ground level, we could smell a hydrocarbon odor and see visible vapors (i.e. refraction) from the tanks. The tank battery was connected to three low pressure towers (aka vapor recovery towers), although we could not discern by observation if they were operating at the time of our inspection. The combustor was not operating, although emissions from the top of the stack were visible with the FLIR camera. We recorded numerous FLIR videos of emissions from thief hatches and confirmed the presence of volatile organic compounds (VOC) in the emissions plume using a Photo Ionization Detector (PID). The combustor was located downhill from the

tank battery in a gully. EPA could not tell if the tank battery was piped to the combustor. Only the lines from the three separators appeared to go to the combustor.

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

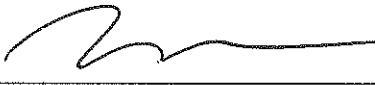
Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

Compliance Assistance: We shared what we observed with the FLIR camera with URO representatives.

Concerns: We had concerns about design and operation of the vapor capture and control systems at the facilities, which we discussed with URO representatives. We also discussed the concern that because these facilities were acquired from another company and much of the operations are currently contracted out, there appears to be a lack of historical information and knowledge about how the facilities were constructed and are currently operated.

SIGNATURES

Report Author:  Date: 6/4/19

Section Chief:  Date: 6/4/19

Facility Name: Utica Resource Operating, LLC – Garvin Well Pad
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APPENDICES AND ATTACHMENTS

1. Digital image/video log

Facility Name: Utica Resource Operating, LLC – Garvin Well Pad

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APPENDIX A: DIGITAL IMAGE/VIDEO LOG

1. Inspector Name: Victoria Nelson	2. Dates of Inspection: April 18, 2019
3. Company/Facility Name: Utica Resource Operating, LLC – Garvin Well Pad	4. Street Address, City, State: 39.56399, -81.5081, Wills Township, Ohio
5. Number of Images and Videos: 9	6. Archival Record Location: C:\Users\Vnelson\OneDrive - Environmental Protection Agency (EPA)\MyCases\Utica Resource\Inspection Reports

Video Number	File Name	Date	Description of Video
1	MOV_2416.mp4	4/18/2019	Emissions from water condensate tank thief hatch
2	MOV_2417.mp4	4/18/2019	Emissions from Tank 2269 thief hatch
3	MOV_2418.mp4	4/18/2019	Emissions from Tank 2267 thief hatch
4	MOV_2419.mp4	4/18/2019	Emissions from combustor - combustor was not operating
5	MOV_2420.mp4	4/18/2019	Emissions from 2-H Separator during dump

Image Number	File Name	Date and Time (Eastern Time)	Latitude and Longitude	Description of Image
1	P4180045.JPG	4/18/2019 4:34:39 PM	39.56322, -81.507512	Line to combustor in gully
2	P4180046.JPG	4/18/2019 4:35:12 PM	39.563047, -81.507435	View of combustor, access road, and tank battery
3	P4180047.JPG	4/18/2019 4:36:50 PM	39.563405, -81.507602	Line leading to base of combustor
4	P4180048.JPG	4/18/2019 4:36:55 PM	39.563405, -81.507602	Line from combustor leading to separators