

Uinta Wax Operating, LLC – Uinta Basin, Utah Well Pads On-Site Partial Compliance Evaluations (PCE)

Inspection Dates: 10/3/2022 and 10/4/2022

Inspection Report Date: 11/2/2022

Inspection Report Prepared By: Sara Loiacono, US EPA  Digitally signed by SARA LOIACONO
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Date: 2022.11.02 15:02:29 -06'00'

Inspection Report Reviewed By: Scott Patefield, Manager, US EPA Region 8, Enforcement and Compliance Assurance Division, Air and Toxics Enforcement Branch
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EPA Representatives: Inspectors from EPA Region 8, Enforcement and Compliance Assurance Division, Air and Toxics Enforcement Branch

- Sara Loiacono, Physical Scientist
- Youn Joo Kim, Life Scientist

Company Representatives: Jason Lachance, Senior Facilities Engineer, Finley Resources Inc.¹
Lynn Hadlock, Environmental Foreman, Finley Resources Inc.¹

State Representatives: N/A

Tribal Representatives: Mike Natchees, Director, Air Quality Program, Ute Indian Tribe
Marie Kaufusi, Air Quality Program, Ute Indian Tribe
Lonnie Favel, Air Quality Program, Ute Indian Tribe
Monaco Weidner, Air Quality Program, Ute Indian Tribe

Parent Company Name: Uinta Wax Operating, LLC

Parent Company Address: 5128 Apache Plume Road, Suite 30
Fort Worth, Texas 76109

Facilities County/State Location: Uintah County, Utah

EPA Region: Region 8

Specific Facility Information: See Table 1, p. 2

Inspection Information

As part of a regional effort to evaluate emissions from tanks, operation of combustion devices, and to assess compliance with applicable regulations and requirements for storage vessels and combustion devices (e.g. NSPS OOOO, NSPS OOOOa), personnel from the United States Environmental Protection Agency (EPA) and the Ute Indian Tribe Air Quality Program visited several Uinta Wax Operating, LLC (UWO) well pads in the Uinta Basin, Utah. Inspectors used audio, visual, and olfactory (AVO) observations and optical gas imaging (OGI) cameras to detect improperly-operating control devices and emissions from tanks and combustion sources. Table 1, on page 2, lists the well pads inspected.

¹ It is Ms. Loiacono's understanding that Finley Resources, LLC, is the official employer of Mr. Lachance and Mr. Hadlock's, but as part of their roles, both employees also perform work for Uinta Wax Operating, LLC.

Table 1 – Facility Information

Site Number	Inspection Date	Facility Name/Site ID	Latitude	Longitude	Well API ID(s)
1	10/3/2022	Ute Tribal 30-01-4-3E Ute Tribal 29-04-4-3E Ute Tribal 20-13-4-3E Ute Tribal 19-16-4-3E	40.1151104	-109.6875387	4304756705 4304756704 4304756702 4304756700
2	10/3/2022	Ute Tribal 2-13-4-2E-H1	40.140286	-109.713497	4304754751
3	10/3/2022	Ute Tribal 3-35-2-3-2E-H1	40.183798	-109.739527	4304754740
4	10/3/2022	Ute Tribal 05-13-5-3E Ute Tribal 07-08-5-3E Lamb Tribal 08-04-5-3E	40.0711129	-109.6933305	4304756677 4304756674 4304756675
5	10/3/2022	Ute Tribal 01-16-5-2E Ute Tribal 12-01-5-2E	40.0720848	-109.7108201	4304756673 4302756671
6	10/3/2022	Ute Tribal 36-16-4-2E Ute Tribal 36-09-4-2E Ute Tribal 31-13-4-3E	40.0869477	-109.7098952	4304756660 4304756658 4304756657
7	10/3/2022	Ute Tribal 15-16-4-2E	40.130642	-109.771226	4304752208
8	10/3/2022	Ute Tribal 4-32-3-2E	40.184452	-109.800232	4304752194
9	10/3/2022	Ute Tribal 14-28-3-2E-H1	40.187786	-109.776186	4304753779
10	10/3/2022	Ute Tribal 15-22-15-3-1E-H1	40.198327	-109.871103	4304755363
11	10/3/2022	Ute Waratza 5-23-3-1E	40.209662	-109.857425	4304753824
12	10/4/2022	Ute Tribal 4-23-3-1W-H1 RP14N-31W-H7WS	40.213108	-109.970215	4304753818 4304755898
13	10/4/2022	Ute Tribal 2-23-3-1W	40.213731	-109.961346	4304753817
14	10/4/2022	Ute Tribal 2-23-3-1W-H1	40.214161	-109.959083	4304754709
15	10/4/2022	Ute Tribal 13-13-3-1W-H1	40.21351	-109.95174	4304753819
16	10/4/2022	Ute Tribal 3-24-3-1W-H1	40.214395	-109.949079	4304754708
17	10/4/2022	Ute Tribal 2-24-3-1W-H1	40.212853	-109.941993	4304753815

In general, the inspection team used the following approach for the site inspections:

1. Take a video in visual mode of an overview of the site operations and scan the site for safety issues using the OGI camera in high-sensitivity mode (HSM).
2. Take a photograph of the site/Well ID sign(s).
3. Make notations about the site operation including the number of each major type of site process equipment present (e.g., number of separators/heater treaters, number of tanks, number and type of tank emission control devices, etc.).
4. Note any AVO indications of emissions from the tanks, closed vent system, and control devices, and note any AVO indications that the control device(s) were not functioning properly.
5. Survey site operations using OGI (auto, manual, and/or high-sensitivity modes), detecting emissions escaping from tanks, closed vent system, and control devices.

General Facility Information

Table 2, p. 3, documents the primary equipment observed onsite at each location, as well as whether indications existed (such as pump jack movement, separator operation, or tank heater operation) that, at the time of the inspection, the site was receiving materials produced from associated wells. At all well pads inspected, the vapor space from produced water tanks was vented to and in direct communication with the closed vent system header that serviced the oil tanks. Note that, when used in the table below, and elsewhere throughout this report, “ECD” means Enclosed Combustion Device and “BPR” means backpressure regulator.

Table 2 - Site Characteristics Observed During Inspection										
Site Number	Facility Name/Site ID	Tank System ID (if applicable)	Processing Indication	# Wells	# Separators/Treaters	Total # Tanks	Oil Tanks (# and Size)	Produced Water Tanks (# and Size)	# Control Devices	Control Device Info
1	Ute Tribal 30-01-4-3E Ute Tribal 29-04-4-3E Ute Tribal 20-13-4-3E Ute Tribal 19-16-4-3E	Ute Tribal 19-16-4S-3E	Pump jacks operating	4	4	12	8 – 400 bbl	4 – 400 bbl	2	Steffes Flares ² (1 Air-Assist Low-Pressure and 1 Non-Assist High-Pressure)
2	Ute Tribal 2-13-4-2E-H1	Ute Tribal 2-13-4-2E-H1	Pump jack operating	1	1	4	3 – 1,000 bbl ³	1 – 1,000 bbl	1	Cimarron 48” ECD
3	Ute Tribal 3-35-2-3-2E-H1	Ute Tribal 3-35-2-3-2E-H1	Pump jack operating	1	1	4	3 – 1,000 bbl	1 – 1,000 bbl	1	Cimarron 48” ECD
4	Ute Tribal 05-13-5-3E Ute Tribal 07-08-5-3E Lamb Tribal 08-04-5-3E		Pump jacks operating	3	3	9	6 – 500 bbl	3 – 500 bbl	1	Steffes Flare
5	Ute Tribal 01-16-5-2E Ute Tribal 12-01-5-2E		Shut-in	2	2	6	4 – 500 bbl	2 – 500 bbl	1	SFI 60” ECD No BPR
6	Ute Tribal 36-16-4-2E Ute Tribal 36-09-4-2E Ute Tribal 31-13-4-3E		Pump jacks operating	3	3	9	6 – 400 bbl	3 – 400 bbl	1	Steffes Air-Assist Flare
7	Ute Tribal 15-16-4-2E	Ute Tribal 15-16-4-2E	Pump jack operating	1	1	4	3 – 400 bbl	1 – 400 bbl	1	Cimarron 60” ECD No BPR
8	Ute Tribal 4-32-3-2E	Ute Tribal 4-32-3-2E	Pump jack operating	1	1	4	3 – 400 bbl	1 – 400 bbl	1	Cimarron 48” STD ECD No BPR
9	Ute Tribal 14-28-3-2E-H1	Ute Tribal 14-28-3-2E-H1	Shut-in	1	1	4	3 – 1,000 bbl	1 – 1,000 bbl	1	Cimarron 48” HV ECD
10	Ute Tribal 15-22-15-3-1E-H1	Ute Tribal 15-22-15-3-1E-H1	Pump jack operating	1	1	3	2 – 1,000 bbl	1 – 1,000 bbl	1	Cimarron 48” HV ECD
11	Ute Waratza 5-23-3-1E	Ute Waratza 5-23-3-1E	Pump jack operating	1	1	3	2 – 400 bbl	1 – 400 bbl	2	1 SFI 48” ECD ⁴ 1 Cimarron 48” ECD ⁴
12	Ute Tribal 4-23-3-1W-H1 RP14N-31W-H7WS	Ute Tribal 4-23-3-1W-H1	Pressure on separator	1	1	4	3 – 1,000 bbl	1 – 1,000 bbl	1	Cimarron 48” HV ECD ⁵
		RP14N-31W-H7WS	Rotaflex operating	1	1	2	2 – 400 bbl	0		
13	Ute Tribal 2-23-3-1W		Pump jack operating	1	1	3	2 – 400 bbl	1 – 400 bbl	1	Cimarron 48” ECD No BPR

Site Number	Facility Name/Site ID	Tank System ID (if applicable)	Processing Indication	# Wells	# Separators/Treaters	Total # Tanks	Oil Tanks (# and Size)	Produced Water Tanks (# and Size)	# Control Devices	Control Device Info
14	Ute Tribal 2-23-3-1W-H1		Rotaflex operating	1	1	3	2 – 1,000 bbl	1 – 1,000 bbl	1	Cimarron 48” HV ECD
15	Ute Tribal 13-13-3-1W-H1	Ute Tribal 13-13-3-1W-H1	Pump jack operating	1	1	4	3 – 400 bbl	1 – 400 bbl	1	Cimarron 60” ECD No BPR
16	Ute Tribal 3-24-3-1W-H1	Ute Tribal 3-24-3-1W-H1	Pump jack operating	1	1	3	2 – 400 bbl	1 – 400 bbl	1	Cimarron 60” ECD No BPR
17	Ute Tribal 2-24-3-1W-H1	Ute Tribal 2-24-3-1W-H1	Pump jack operating	1	1	3	2 – 1,000 bbl	1 – 1,000 bbl	1	Cimarron 48” HV ECD

² The Steffes air-assist low-pressure flare is utilized as the primary control device for the tank system. The non-assist high-pressure flare is utilized to combust sales gas during periods of gas pipeline unavailability (e.g. high line pressures).

³ Oil Tank #1 was out of service due to fire damage. See photos DC_3078, DC_3082, and DC_3083 for image of tank and lockout/tagout (LOTO).

⁴ The 48” SFI ECD is utilized for control of tank emissions; the 48” Cimarron ECD is utilized for combustion of associated gas, as there is no sales gas pipeline access at the site. No back pressure regulator is installed prior to the inlet of the 48” Cimarron ECD.

⁵ Both Tank Systems are connected by a common vapor line and routed to the shared ECD.

Table 3, below, describes Inspection Observations and Areas of Concern identified during the inspection. The table lists the emissions or other operational issues noted by the inspector, the method(s) of detection used by the inspector, and any corresponding visual-spectrum or OGI photo and/or video files taken of the activity or emissions source. Note that, when used in the table below, and elsewhere throughout this report, “UBHC” means unburned hydrocarbons (as observed with OGI), “TH” means thief hatch, “CVS” means closed vent system, and “KO” means knock-out.

Areas of concern indicate potential noncompliance with applicable requirements. Areas of concern were verbally conveyed on site by EPA inspectors to UWO representatives on the same day as the associated inspections.

Table 3 – Inspection Observations and Areas of Concern							
Site Number	Tank Battery ID	Equipment or Location	AVO Observation Details	OGI Emissions Observed?	OGI Observation Details	Additional Observation Notes	Picture/Video File ID(s)
2	Ute Tribal 2-13-4-2E-H1	ECD	BPR valve pinned in open position	Y	Trailing UBHC from top of ECD	BPR valve not functioning	MOV_3079; MOV_3080; DC_3081
3	Ute Tribal 3-35-2-3-2E-H1	Blowdowns on produced water tank and oil tank #1		Y	Continuous stream of emissions from blowdowns on produced water tank and oil tank #1		MOV_3085
3	Ute Tribal 3-35-2-3-2E-H1	ECD	Weak flames on rails	Y	Continuous stream of UBHC from top of ECD; not hot at ECD outlet	BPR valve not functioning	MOV_3086; MOV_3087
3	Ute Tribal 3-35-2-3-2E-H1	TH on produced water tank		Y	Emissions from TH on tank	Occurred after blowdown valves closed; gasket replaced by UWO personnel while on site	MOV_3088
4	Ute Tribal 05-13-5-3E Ute Tribal 07-08-5-3E Lamb Tribal 08-04-5-3E	Flare	Continuous black smoke	N	N/A	S. Loiacono performed M22 reading; more than 1 minute of visible emissions in a 15-minute period	N/A
5	Ute Tribal 01-16-5-2E Ute Tribal 12-01-5-2E	ECD	Weak flames on rails	Y	UBHC from outlet of ECD; not hot at ECD outlet	No BPR valve	MOV_3094
7	Ute Tribal 15-16-4-2E	ECD	Pilot present but no flames on rails; HC odors	Y	Continuous stream of UBHC from ECD outlet; no heat signature	NO BPR valve	MOV_3098; MOV_3099
7	Ute Tribal 15-16-4-2E	CVS	Low spots in vent line from liquid KO to ECD	N	N/A	Potential for liquids accumulation in vent line	DC_3100

Site Number	Tank Battery ID	Equipment or Location	AVO Observation Details	OGI Emissions Observed?	OGI Observation Details	Additional Observation Notes	Picture/Video File ID(s)
8	Ute Tribal 4-32-3-2E	ECD	Pilot present but no flames on rails	Y	UBHC from ECD outlet; no heat signature	No PBR valve	MOV_3101; MOV_3103
9	Ute Tribal 14-28-3-2E-H1	ECD	Pilot present but no flames on rails	Y	UBHC from ECD outlet; no heat signature	BPR valve present but not properly functioning	MOV_3106; MOV_3107
10	Ute Tribal 15-22-15-3-1E-H1	ECD	BPR pinned open	Y	UBHC from ECD outlet		MOV_3108; MOV_3109; DC_3110
10	Ute Tribal 15-22-15-3-1E-H1	CVS	Vent line slopes from liquid KO to ECD	N	N/A	Potential for liquids accumulation in ECD	DC_3111
11	Ute Waratza 5-23-3-1E	SFI ECD	Pilot present but no flames on rails	Y	UBCH from ECD outlet; no heat signature	BPR in closed position indicates valve not fully closed/seated	MOV_3117
12	RP14N-31W-H7WS	TH on oil tank #3	TH open	Y	Continuous emissions from TH on oil tank #3	Closed by UWO personnel while on site	MOV_3121; MOV_3123
12	RP14N-31W-H7WS	Dry gas line		Y	Emissions from regulator	Dry gas line used to power glycol pumps for heat trace.	MOV_3128
12	Ute Tribal 4-23-3-1W-H1	CVS	Vent line connecting tank systems has 90° vertical angle from ground	N	N/A	Potential for liquid accumulation in vent line	DC_3125
13	Ute Tribal 2-23-3-1W	ECD	HC odors; pilot present but weak flames on rails	Y	Continuous stream of UBHC from outlet of ECD; no heat signature	No BPR valve	MOV_3130; MOV_3131; MOV_3133
13	Ute Tribal 2-23-3-1W	Tank heater		Y	Continuous stream of emissions from tank heater stack	UWO personnel performed troubleshooting on heater stack but were unable to resolve emissions while on site	MOV_3130; MOV_3132
14	Ute Tribal 2-23-3-1W-H1	TH on produced water tank	HC odors	Y	Puffs of emissions from TH		MOV_3136
14	Ute Tribal 2-23-3-1W-H1	ECD	Flames present on only one row on burner rails	Y	Continuous stream of UBHC from outlet of ECD; no heat signature	BPR valve pinned open	MOV_3135; DC_3138; MOV_3139
15	Ute Tribal 13-13-3-1W-H1	ECD	HC odors; weak flames	Y	Trailing UBHC emissions from outlet of ECD	Also detected emissions from regulator on pilot supply valve	MOV_3142; MOV_3143

Site Number	Tank Battery ID	Equipment or Location	AVO Observation Details	OGI Emissions Observed?	OGI Observation Details	Additional Observation Notes	Picture/Video File ID(s)
16	Ute Tribal 3-24-3-1W-H1	ECD	No BPR valve; pilot present and flames on rails	Y	Emissions from outlet of ECD		MOV_3145
16	Ute Tribal 3-24-3-1W-H1	CVS	Low point at 90° elbow in vent line from tanks to ECD	N	N/A	Potential for liquids accumulation in vent line	DC_3147
16	Ute Tribal 3-24-3-1W-H1	Produced water tank	HC odors	Y	Emissions from top of tank; possibly from tank heater stack		MOV_3148
17	Ute Tribal 2-24-3-1W-H1	ECD	Pilot present but flames intermittent	Y	Trailing UBHC emissions from outlet of ECD	BPR valve pinned open	MOV_3151
17	Ute Tribal 2-24-3-1W-H1	CVS	Low spot in vent line from KO to ECD	N	N/A	Potential for liquids accumulation in vent line	

Table 4, below, lists the photos and videos taken at each site to document facility operations.

Table 4 – Photo/Video Log				
Site Number	Date	Picture/Video File ID(s)	Photographer	Description
1	10/3/2022	DC 3072.jpg	Sara Loiacono	ID Sign on Tank System (Ute Tribal 19-16-4S-3E)
1	10/3/2022	MOV 3073.mp4	Sara Loiacono	Site overview and HSM scan
1	10/3/2022	DC 3074.jpg	Sara Loiacono	Photo of Steffes air-assist low-pressure flare
1	10/3/2022	DC 3075.jpg	Sara Loiacono	Site entry sign
2	10/3/2022	DC 3076.jpg	Sara Loiacono	ID Sign on tank battery
2	10/3/2022	MOV 3077.mp4	Sara Loiacono	Site overview and HSM scan
2	10/3/2022	DC 3078.jpg	Sara Loiacono	Tank battery; visible fire damage to Oil Tank #1
2	10/3/2022	MOV 3079.mp4	Sara Loiacono	ECD – note trailing UBHC emissions
2	10/3/2022	MOV 3080.mp4	Sara Loiacono	ECD – note trailing UBHC emissions
2	10/3/2022	DC 3081.jpg	Sara Loiacono	PBR valve on ECD; pinned in open position
2	10/3/2022	DC 3082.jpg	Sara Loiacono	LOTO on Oil Tank #1
2	10/3/2022	DC 3083.jpg	Sara Loiacono	LOTO on Oil Tank #1
3	10/3/2022	MOV_3084.mp4	Sara Loiacono	Site overview and HSM scan – emissions from blowdown on produced water tank and oil tank #1
3	10/3/2022	MOV_3085.mp4	Sara Loiacono	Continuous stream of emissions from blowdowns on produced water tank and oil tank #1
3	10/3/2022	MOV 3086.mp4	Sara Loiacono	Continuous stream of UBHC from top of ECD
3	10/3/2022	MOV_3087.mp4	Sara Loiacono	Blowdown valves after closure; UBHC from outlet of ECD
3	10/3/2022	MOV 3088.mp4	Sara Loiacono	Emissions from TH on produced water tank
3	10/3/2022	DC 3089.jpg	Sara Loiacono	Site entry sign
4	10/3/2022	DC 3090.jpg	Sara Loiacono	Site entry sign
4	10/3/2022	MOV 3091.mp4	Sara Loiacono	Site overview and HSM scan
5	10/3/2022	MOV_3092.mp4	Sara Loiacono	Site overview and HSM scan; UBHC from top of ECD
5	10/3/2022	DC 3093.jpg	Sara Loiacono	Site entry sign
5	10/3/2022	MOV 3094.mp4	Sara Loiacono	UBHC from outlet of ECD
5	10/3/2022	MOV_3095.mp4	Sara Loiacono	ECD after UWO personnel sent pressurized gas to ECD
6	10/3/2022	MOV 3096.mp4	Sara Loiacono	Site overview and HSM scan
6	10/3/2022	DC 3097.jpg	Sara Loiacono	Site entry sign
7	10/3/2022	MOV_3098.mp4	Sara Loiacono	Site overview and HSM scan; UBHC from outlet of ECD; no heat signature
7	10/3/2022	MOV 3099.mp4	Sara Loiacono	UBHC from outlet of ECD; no heat signature
7	10/3/2022	DC 3100.jpg	Sara Loiacono	Low spot in vent line between liquid KO and ECD
8	10/3/2022	MOV_3101.mp4	Sara Loiacono	Site overview and HSM scan; UBHC from outlet of ECD
8	10/3/2022	DC 3102.jpg	Sara Loiacono	ID sign on tank battery
8	10/3/2022	MOV 3103.mp4	Sara Loiacono	UBHC from outlet of ECD; no heat signature
9	10/3/2022	MOV 3104.mp4	Sara Loiacono	Site overview and HSM scan
9	10/3/2022	DC 3105.jpg	Sara Loiacono	ID sign on tank battery
9	10/3/2022	MOV 3106.mp4	Sara Loiacono	UBHC from outlet of ECD; no heat signature
9	10/3/2022	MOV 3107.mp4	Sara Loiacono	UBHC from outlet of ECD; no heat signature
10	10/3/2022	MOV_3108.mp4	Sara Loiacono	Site overview and HSM scan; UBHC from outlet of ECD
10	10/3/2022	MOV 3109.mp4	Sara Loiacono	UBHC from outlet of ECD
10	10/3/2022	DC 3110.jpg	Sara Loiacono	PBR valve on ECD; pinned in open position
10	10/3/2022	DC_3111.jpg	Sara Loiacono	Vent line from liquid KO to ECD; downward slope toward ECD

Site Number	Date	Picture/Video File ID(s)	Photographer	Description
10	10/3/2022	DC_3112.jpg	Sara Loiacono	ID sign on tank battery
10	10/3/2022	DC_3113.jpg	Sara Loiacono	Vapor recovery line on tank battery
11	10/3/2022	MOV_3114.mp4	Sara Loiacono	Site overview and HSM scan
11	10/3/2022	DC_3115.jpg	Sara Loiacono	Associated gas ECD (left) and tank control ECD (right)
11	10/3/2022	DC_3116.jpg	Sara Loiacono	BPR and automation system on tank control ECD
11	10/3/2022	MOV_3117.mp4	Sara Loiacono	Associated gas ECD (left) and tank control ECD (right); UBHC from top of tank control ECD; no heat signature
11	10/3/2022	DC_3118.jpg	Sara Loiacono	ID sign on tank battery
11	10/3/2022	DC_3119.jpg	Sara Loiacono	ID sign on tank battery
12	10/4/2022	MOV_3121.mp4	Sara Loiacono	Site overview and HSM scan; emissions from TH on oil tank #3
12	10/4/2022	DC_3122.jpg	Sara Loiacono	ID sign on Ute Tribal 4-23-3-1W-H1 tank battery
12	10/4/2022	MOV_3123.mp4	Sara Loiacono	Continuous emissions from TH on RP14N-31W-H7WS tank battery, oil tank #3
12	10/4/2022	DC_3124.jpg	Sara Loiacono	ID sign on RP14N-31W-H7WS Tank System
12	10/4/2022	DC_3125.jpg	Sara Loiacono	Vent line connecting tank batteries; note low spot at 90° elbow in line where piping goes from ground level to vertical
12	10/4/2022	DC_3126.jpg	Sara Loiacono	Vent line from tank batteries to ECD
12	10/4/2022	MOV_3127.mp4	Sara Loiacono	Accidental video of ECD
12	10/4/2022	MOV_3128.mp4	Sara Loiacono	Emissions from dry gas line used to power glycol pumps for heat trace
12	10/4/2022	DC_3129.jpg	Sara Loiacono	Vent line from Ute Tribal 4-23-3-1W-H1 tank battery
13	10/4/2022	MOV_3130.mp4	Sara Loiacono	Site overview and HSM scan; emissions from tank heater stack on oil tank and UBHC from outlet of ECD
13	10/4/2022	MOV_3131.mp4	Sara Loiacono	Continuous stream of UBHC from outlet of ECD; no heat signature
13	10/4/2022	MOV_3132.mp4	Sara Loiacono	Continuous stream of emissions from tank heater stack on end oil tank
13	10/4/2022	MOV_3133.mp4	Sara Loiacono	Continuous stream of UBHC from outlet of ECD; no heat signature
13	10/4/2022	DC_3134.jpg	Sara Loiacono	ID sign on tank battery
14	10/4/2022	MOV_3135.mp4	Sara Loiacono	Site overview and HSM scan; UBHC from outlet of ECD
14	10/4/2022	MOV_3136.mp4	Sara Loiacono	Emissions from TH on produced water tank
14	10/4/2022	DC_3137.jpg	Sara Loiacono	ID sign on tank battery
14	10/4/2022	DC_3138.jpg	Sara Loiacono	BPR valve on ECD pinned in open position
14	10/4/2022	MOV_3139.mp4	Sara Loiacono	Continuous stream of UBHC from outlet of ECD; no heat signature
15	10/4/2022	MOV_3140.mp4	Sara Loiacono	Site overview and HSM scan
15	10/4/2022	DC_3141.jpg	Sara Loiacono	ID sign on tank battery
15	10/4/2022	MOV_3142.mp4	Sara Loiacono	UBHC from outlet of ECD
15	10/4/2022	MOV_3143.mp4	Sara Loiacono	Emissions from regulator valve on pilot supply line when valve turned to closed position
16	10/4/2022	MOV_3144.mp4	Sara Loiacono	Site overview and HSM scan
16	10/4/2022	MOV_3145.mp4	Sara Loiacono	Emissions from outlet of ECD
16	10/4/2022	DC_3146.jpg	Sara Loiacono	ID sign on tank battery
16	10/4/2022	DC_3147.jpg	Sara Loiacono	Low point at 90° elbow in vent line from tank battery to ECD

Site Number	Date	Picture/Video File ID(s)	Photographer	Description
16	10/4/2022	MOV_3148.mp4	Sara Loiacono	Emissions from produced water tank; possibly from tank heater stack
17	10/4/2022	MOV_3149.mp4	Sara Loiacono	Site overview and HSM scan
17	10/4/2022	DC_3150.jpg	Sara Loiacono	ID sign on tank battery
17	10/4/2022	MOV_3151.mp4	Sara Loiacono	UBHC from outlet of ECD