

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 8

2014 OCT 16 PM 2:45

In the Matter of:)	
)	
Newfield Production Company)	
Various Well Sites and)	
Sundance Compressor Station)	Compliance Order on Consent
Uinta Basin, Utah)	
)	
RESPONDENT)	
)	Docket No: CAA-08-2015-0001
Proceeding Under Section)	
113 of the Clean Air Act,)	
42 U.S.C. §7413)	
)	

FILED
EPA REGION VIII
HEARING CLERK

STATUTORY AUTHORITY

This Compliance Order on Consent (Order) is issued to Newfield Production Company pursuant to section 113(a)(3)(B) of the Clean Air Act (CAA), 42 U.S.C. § 7413(a)(3)(B), as amended, for violations of the CAA, 42 U.S.C. §§ 7401-7671. The authority to issue the Order has been properly delegated to the Assistant Regional Administrator, Office of Enforcement, Compliance, and Environmental Justice, Environmental Protection Agency (EPA) Region 8.

BACKGROUND

1. Newfield Production Company (Newfield) is an independent energy company with its principal place of business located in Denver, Colorado. Newfield is engaged in the exploration, development and production of crude oil, natural gas and natural gas liquids in the Uinta Basin in Utah.
2. On February 19, 2013, April 1, 2013, May 14, 2013 and December 9, 2013, Newfield self-disclosed to the EPA potential CAA violations at facilities located on state lands and on the Uintah & Ouray Indian Reservation in the Uinta Basin under EPA’s Audit Policy (Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations; Notice, Federal Register Vol. 65, No. 70, Tuesday, April 11, 2000).
3. On December 9, 2013, February 10, 2014, April 23, 2014, and May 1, 2014, based on direction from and in agreement with the EPA, Newfield submitted portable analyzer testing protocols to the EPA for approval to resolve the testing violations outlined in paragraph 6.

4. On June 5, 2014, the EPA approved the testing protocol submitted on May 1, 2014.
5. On August 21, 2014, the EPA and Newfield agreed to settle this matter via this Order, as well as a Combined Complaint and Consent Agreement assessing a total cash penalty of \$246,000. This Order addresses the injunctive relief component of the settlement.

EPA FINDINGS OF VIOLATION

6. The following CAA potential violations were self-disclosed to the EPA by Newfield per the EPA's Audit Policy:
 - a. 40 C.F.R. part 60, subpart JJJJ--Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (NSPS JJJJ)
 - i. Failure to perform an initial NSPS subpart JJJJ performance test for the engines listed in Appendix A within 180 days of start-up, a violation of 40 C.F.R. § 60.4243(b)(2)(i).
 - ii. Failure to submit test results within 60 days after doing the subpart JJJJ initial performance testing for the engines listed in Appendix B, a violation of 40 C.F.R. § 60.4245(d).
 - b. 40 C.F.R. part 60, subpart KKK—Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants for Which Construction, Reconstruction or Modification Commenced After January 20, 1984, and on or Before August 23, 2011(NSPS KKK).
 - i. Failure to timely submit an initial NSPS KKK notification for the Sundance Compressor Station, a violation of 40 C.F.R. § 60.7(a).
 - c. 40 C.F.R. part 49, Federal Minor New Source Review Program in Indian Country (Tribal Minor NSR) and CAA section 112(r) (Risk Management Plans).
 - i. Failure to timely register the facilities listed in Appendix C, a violation of Tribal Minor NSR registration requirements at 40 C.F.R. § 49.151(c)(1)(iii).
 - d. 40 C.F.R. part 68, Chemical Accident Prevention Provisions
 - i. Failure to timely submit a risk management plan at the Sundance Compressor Station, a violation of 40 C.F.R. Part 68.
7. The potential violations in sub paragraphs 6.a.ii., 6.b, 6.c, and 6.d, above have been corrected.
8. To remedy the potential violations in subparagraph 6.a.i. above, Respondent agrees to complete NOx and CO emissions testing using a portable analyzer per Method ASTM 6522-00 and the EPA approved reduced testing time and equivalent emissions calculations per the June 5, 2014 letter (Appendix D) issued by the EPA to Newfield for the engines listed in Appendix A by September 15, 2015.
9. The engine locations and testing schedule in Appendix A and Paragraph 12 below is in lieu of the 30-day testing notification requirement per 40 C.F.R. § 60.8(d).
10. Respondent must then submit the testing results within 60 days to the EPA per 40 C.F.R. § 60.4245(d).

11. Respondent neither admits nor denies the specific potential violations alleged above.

COMPLIANCE ORDER

12. Pursuant to section 113(a)(3)(B) of the CAA, 42 U.S.C. § 7413(a)(3)(B), the EPA hereby issues the following order to Newfield:

Newfield shall complete NSPS JJJJ portable analyzer testing and reporting to the EPA for those engines in Appendix A, based on the following schedule:

- a. Twenty-five (25) percent of engines tested by December 31, 2014;
- b. Fifty (50) percent of engines tested by March 31, 2015;
- c. Seventy-five (75) of engines tested by June 30, 2015;
- d. Remaining engines tested by September 30, 2015.

13. The list of engines to be tested, as set forth in Appendix A, may be modified upon mutual agreement by EPA and Respondent to account for certain changes in Respondent's operations, including, for example, engines that Respondent has divested or otherwise removed from service.

REPORTING REQUIREMENTS

14. Respondent agrees to submit quarterly progress reports, commencing within 90 days of the date the final order approving this Agreement is issued. The purpose of such reports is to provide the status of Respondent's efforts to comply with the terms of settlement in this Agreement. Submissions of reports required by this Paragraph, shall be addressed to:

Director
Air & Toxics Technical Enforcement Program
U.S. EPA Region 8 (Mail Code 8ENF-AT)
1595 Wynkoop St.
Denver, CO 80202-1129

ENFORCEMENT

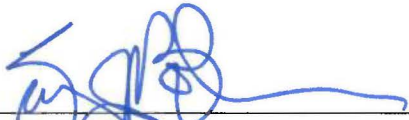
15. Issuance of this Order does not preclude any other action by the EPA to redress past or future violations of the CAA not addressed in this Order or the Combined Complaint and Consent Agreement, including any of the following:

- a. an administrative penalty complaint pursuant to section 113(d) of the CAA, 42 U.S.C. § 7413(d), for penalties of not more than \$37,500 per day for each violation;
 - b. a civil action pursuant to section 113(b) of the CAA, 42 U.S.C. § 7413(b), for injunctive relief or civil penalties of not more than \$37,500 per day for each violation occurring; and
 - c. a criminal action pursuant to 42 U.S.C. § 7413 or Title 18 of the U.S. Code.
16. Pursuant to section 120 of the CAA, 42 U.S.C. § 7420, the EPA is also authorized to assess noncompliance penalties for violations not addressed in this Order or the Combined Complaint and Consent Agreement aimed at recovering the economic value which any person received by not complying with the CAA.
 17. Pursuant to the Combined Complaint and Consent Agreement, and upon incorporation of that Combined Complaint and Consent Agreement into a final order by the Regional Judicial Officer, full payment of the penalty (\$246,000) shall resolve Newfield's liability for civil penalties for violations alleged in the Combined Complaint and Consent Agreement and this Order.
 18. Respondent's completion of the requirements of this Order shall resolve any and all claims for injunctive relief on behalf of EPA which arose from the violations alleged in the Combined Complaint and Consent Agreement and this Order.
 19. Pursuant to section 113(a)(3) of the CAA, 42 U.S.C. § 7413(a)(3), failure to comply with this Order may lead to a civil action to obtain compliance and/or an action for civil or criminal penalties.
 20. By consenting to this order, Newfield waives federal judicial review of the Order which would otherwise be available pursuant to section 307(b)(1) of the CAA, 42 U.S.C. § 7607(b)(1).

UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY, REGION 8,
Office of Enforcement, Compliance, and
Environmental Justice

COMPLAINANT.

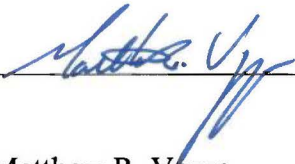

Date: October 16, 2014

By: 
Suzanne J. Bohan
Acting Assistant Regional Administrator
Office of Enforcement, Compliance and
Environmental Justice

NEWFIELD PRODUCTION COMPANY

RESPONDENT.

Date: 10-3-14

By: 
PRINTED NAME: Matthew R. Veza 

TITLE: Vice President – Rocky Mountains

APPENDIX A: ENGINES TO BE TESTED

Engines on the U&O Reservation

	Well Name	Make	Model	Latitude	Longitude
1	GRTR BNDRY II F-27-8-17	ARROW	L-795	40.091119	-109.999415
2	GRTR BNDRY II L-28-8-17	ARROW	L-795	40.0901	-110.008597
3	UTE TRIBAL 13-36-4-1E	ARROW	L-795	40.086763	-109.837464
4	BELUGA H-17-9-17	ARROW	L-795	40.036173	-110.027306
5	BELUGA Q-16-9-17	ARROW	L-795	40.029195	-110.013278
6	BELUGA F-16-9-17	ARROW	L-795	40.036279	-110.017903
7	BELUGA G-16-9-17	ARROW	L-795	40.0364164	-110.0131733
8	BELUGA I-17-9-17	ARROW	L-795	40.036351	-110.022605
9	JW FED 2-27-9-17	ARROW	L-795	40.00737	-109.98522
10	BLACKJACK L-4-9-17	ARROW	L-795	40.061905	-110.008556
11	HUMPBAC L-25-8-17	ARROW	L-795	40.091036	-109.947478
12	FEDERAL K-34-8-18	ARROW	L-795	40.07598	-109.871851
13	FEDERAL S-34-8-18	ARROW	L-795	40.072338	-109.876634
14	FEDERAL T-34-8-18	ARROW	L-795	40.072454	-109.872444
15	SANDWASH M-31-8-17	ARROW	L-795	40.076705	-110.051089
16	SANDWASH N-31-8-17	ARROW	L-795	40.072737	-110.050478
17	UTE TRIBAL 3-1-5-1E	ARROW	L-795	40.083232	-109.827278
18	GILSONITE R-32-8-17	ARROW	L-795	40.069459	-110.027343
19	BELUGA D-18-9-17	ARROW	L-795	40.04023	-110.054995
20	SANDWASH R-31-8-17	ARROW	L-795	40.072495	-110.046393
21	UTE TRIBAL 14-24-4-1	ARROW	L-795	40.1183507	-109.9460649
22	BELUGA G-17-9-17	ARROW	L-795	40.036307	-110.036638
23	UTE TRIBAL 6-25-4-1	ARROW	L-795	40.11171	-109.94671
24	BLACKJACK O-10-9-17	ARROW	L-795	40.043865	-110.003871
25	BLACKJACK P-10-9-17	ARROW	L-795	40.040309	-110.004101
26	JONAH X-6-9-17	ARROW	L-795	40.049463	-110.049682
27	JONAH C-7-9-17	ARROW	L-795	40.049521	-110.049689
28	SUNDANCE K-10-9-17	ARROW	L-795	40.043544	-109.980211
29	SUNDANCE N-11-9-17	ARROW	L-795	40.047046	-109.975222
30	SUNDANCE Q-11-9-17	ARROW	L-795	40.040085	-109.97553
31	SUNDANCE P-11-9-17	ARROW	L-795	40.039923	-109.980233
32	GRTR BNDRY II N-3-9-17	ARROW	L-795	40.061996	-109.998703
33	BLACKJACK V-4-9-17	ARROW	L-795	40.051077	-110.00334
34	GRTR BNDRY II L-3-9-17	ARROW	L-795	40.057806	-109.984739
35	GRTR BNDRY II M-3-9-17	ARROW	L-795	40.058285	-109.994176
36	LONE TREE R-15-9-17	ARROW	L-795	40.029175	-109.99431

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37	SUNDANCE I-11-9-17	ARROW	L-795	40.050628	-109.970779
38	LONE TREE A-21-9-17	ARROW	L-795	40.022235	-109.998843
39	SUNDANCE L-12-9-17	ARROW	L-795	40.043566	-109.951869
40	SUNDANCE T-11-9-17	ARROW	L-795	40.04356	-109.961522
41	SUNDANCE I-12-9-17	ARROW	L-795	40.047157	-109.947265
42	SUNDANCE S-11-9-17	ARROW	L-795	40.039973	-109.966833
43	SUNDANCE B-12-9-17	ARROW	L-795	40.051315	-109.951755
44	PARIETTE FED R-34-8-18	ARROW	L-795	40.07243	-109.881799
45	GRTR BNDRY II B-3-9-17	ARROW	L-795	40.065007	-109.984383
46	GRTR BNDRY II N-34-8-17	ARROW	L-795	40.072616	-109.999152
47	BLACKJACK N-33-8-17	ARROW	L-795	40.072806	-110.017505
48	CANVASBACK R-22-8-17	ARROW	L-795	40.097989	-109.993989
49	CASTLE DRAW H-2-9-17	ARROW	L-795	40.064955	-109.974637
50	CASTLE DRAW N-2-9-17	ARROW	L-795	40.061752	-109.975533
51	GRTR BNDRY II Q-21-8-17	ARROW	L-795	40.10123	-110.01786
52	ASHLEY D-22-9-15	ARROW	L-795	40.0212814	-110.2227081
53	GRTR BNDRY II R-21-8-17	ARROW	L-795	40.101667	-110.00835
54	GMBU G-28-8-17	ARROW	L-795	40.09415	-110.01784
55	GRTR BNDRY II D-28-8-17	ARROW	L-795	40.09419	-110.01779
56	HUMPBACK S-24-8-17	ARROW	L-795	40.10172	-109.95261
57	SANDWASH S-31-8-17	ARROW	L-795	40.07289	-110.04165
58	GRTR BNDRY II S-21-8-17	ARROW	L-795	40.097947	-110.0028601
59	FEDERAL 3-5-9-18	ARROW	L-795	40.066112	-109.924118
60	GRTR BNDRY II J-29-8-17	ARROW	L-795	40.090864	-110.022542
61	BELUGA T-7-9-17	ARROW	L-795	40.0431	-110.04209
62	MON BUTTE NE K-25-8-16	ARROW	L-795	40.08711	-110.05527
63	GRTR MB T-25-8-16	ARROW	L-795	40.08706	-110.0553
64	LONE TREE P-15-9-17	ARROW	L-795	40.025591	-109.99896
65	GRTR BNDRY II R-28-8-17	ARROW	L-795	40.087287	-110.008577
66	SUNDANCE F-33-8-18	ARROW	L-795	40.076807	-109.90412
67	GMBU T-24-8-16	ARROW	L-795	40.10149	-110.05533
68	GMBU A-25-8-16	ARROW	L-795	40.09824	-110.05469
69	GMBU A-1-9-16	ARROW	L-795	40.0641	-110.05415
70	GMBU N-16-9-17	ARROW	L-795	40.02922	-110.013348
71	GMBU I-22-8-17	ARROW	L-795	40.10521	-109.98959
72	GMBU L-22-8-17	ARROW	L-795	40.10516	-109.98963
73	GMBU H-22-8-17	ARROW	L-795	40.10787	-109.99378
74	GMBU M-22-8-17	ARROW	L-795	40.10531	-109.994
75	GMBU N-22-8-17	ARROW	L-795	40.10526	-109.99404
76	GMBU P-23-8-17	ARROW	L-795	40.09794	-109.98415
77	GMBU S-22-8-17	ARROW	L-795	40.09792	-109.98422

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78	GMBU F-23-8-17	ARROW	L-795	40.10515	-109.98475
79	GMBU G-22-8-17	ARROW	L-795	40.10893	-109.99883
80	GMBU H-36-8-17	ARROW	L-795	40.07636	-109.95651
81	GMBU O-23-8-17	ARROW	L-795	40.10515	-109.98475
82	GMBU L-36-8-17	ARROW	L-795	40.07616	-109.95185
83	FEDERAL 2-17-6-20	ARROW	L-795	40.30374	-109.69047
84	GMBU I-36-8-17	ARROW	L-795	40.07617	-109.95192
85	GMBU K-2-9-17	ARROW	L-795	40.05831	-109.96644
86	GMBU O-2-9-17	ARROW	L-795	40.06172	-109.98021
87	GMBU T-2-9-17	ARROW	L-795	40.05448	-109.966
88	GMBU U-2-9-17	ARROW	L-795	40.05443	-109.96595
89	FEDERAL 4-24-6-20	ARROW	L-795	40.28866	-109.62424
90	GMBU S-32-8-17	ARROW	L-795	40.07348	-110.028007
91	GMBU W-32-8-17	ARROW	L-795	40.06923	-110.03192
92	GMBU Q-36-8-17	ARROW	L-795	40.07307	-109.95635
93	GMBU R-36-8-17	ARROW	L-795	40.06921	-109.95182
94	GMBU I-32-8-17	ARROW	L-795	40.0803581	-110.0224519
95	GMBU J-32-8-17	ARROW	L-795	40.08035	-110.02237
96	GMBU L-17-9-17	ARROW	L-795	40.03302	-110.02729
97	GMBU O-32-8-17	ARROW	L-795	40.07642	-110.0371
98	FEDERAL 16-23-6-20	ARROW	L-795	40.277687	-109.627954
99	GMBU M-17-9-17	ARROW	L-795	40.03308	-110.02729
100	GMBU G-18-9-17	ARROW	L-795	40.03275	-110.0551
101	GMBU K-17-9-17	ARROW	L-795	40.02913	-110.01791
102	GMBU P-32-8-17	ARROW	L-795	40.068547	-110.036738
103	GMBU N-18-9-17	ARROW	L-795	40.03271	-110.05515
104	GMBU B-36-8-17	ARROW	L-795	40.07949	-109.95195
105	GMBU C-36-8-17	ARROW	L-795	40.0795	-109.95202
106	GMBU W-7-9-17	ARROW	L-795	40.03619	-110.05024
107	GMBU D-36-8-17	ARROW	L-795	40.0797938	-109.9565213
108	GMBU Q-17-9-17	ARROW	L-795	40.02547	-110.03685
109	GMBU T-18-9-17	ARROW	L-795	40.02544	-110.03692
110	GMBU K-1-9-16	ARROW	L-795	40.06166	-110.05556
111	GMBU B-2-9-17	ARROW	L-795	40.06549	-109.96601
112	GMBU D-2-9-17	ARROW	L-795	40.06504	-109.97469
113	GMBU J-2-9-17	ARROW	L-795	40.06545	-109.96606
114	GMBU L-7-9-17	ARROW	L-795	40.0469	-110.04201
115	GMBU C-2-9-17	ARROW	L-795	40.06587	-109.97071
116	GMBU O-8-9-17	ARROW	L-795	40.04684	-110.04201
117	GMBU R-5-9-17	ARROW	L-795	40.05718	-110.02729
118	GMBU S-5-9-17	ARROW	L-795	40.05717	-110.02721

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119	GMBU H-7-9-17	ARROW	L-795	40.05021	-110.04551
120	GMBU I-7-9-17	ARROW	L-795	40.05016	-110.0455
121	GMBU K-16-9-17	ARROW	L-795	40.02919	-110.00379
122	GMBU Q-30-8-17	ARROW	L-795	40.08715	-110.05077
123	GMBU R-30-8-17	ARROW	L-795	40.0872	-110.05073
124	GMBU H-16-9-17	ARROW	L-795	40.03278	-110.0084
125	GMBU I-16-9-17	ARROW	L-795	40.03282	-110.00834
126	GMBU S-16-9-17	ARROW	L-795	40.02914	-110.0038
127	GMBU M-16-9-17	ARROW	L-795	40.02883	-110.00802
128	GMBU L-16-9-17	ARROW	L-795	40.02887	-110.00797
129	GMBU W-2-9-17	ARROW	L-795	40.05444	-109.97082
130	GMBU V-32-8-17	ARROW	L-795	40.069415	-110.027381
131	GMBU G-5-9-17	ARROW	L-795	40.06526	-110.03189
132	GMBU Q-18-9-17	ARROW	L-795	40.02524	-110.05511
133	GMBU M-8-9-17	ARROW	L-795	40.04344	-110.02727
134	GMBU L-8-9-17	ARROW	L-795	40.04349	-110.02729
135	GMBU N-17-9-17	ARROW	L-795	40.02975	-110.03135
136	GMBU R-7-9-17	ARROW	L-795	40.0428	-110.04989
137	GMBU M-7-9-17	ARROW	L-795	40.04285	-110.04986
138	GMBU Q-19-8-17	ARROW	L-795	40.09798	-110.05055
139	GMBU Q-6-9-17	ARROW	L-795	40.05797	-110.05076
140	GMBU D-30-8-17	ARROW	L-795	40.09793	-110.05059
141	GMBU H-30-8-17	ARROW	L-795	40.09446	-110.05116
142	GMBU 3A-12-9-18H	ARROW	L-795	40.0508448	-109.8437634
143	GMBU H-5-9-17	ARROW	L-795	40.06196	-110.0319
144	GMBU W-31-8-17	ARROW	L-795	40.06527	-110.05059
145	GMBU M-5-9-17	ARROW	L-795	40.06193	-110.03185
146	GMBU X-31-8-17	ARROW	L-795	40.06523	-110.05065
147	GMBU J-18-9-17	ARROW	L-795	40.03259	-110.03676
148	GMBU R-17-9-17	ARROW	L-795	40.02558	-110.02726
149	GMBU S-17-9-17	ARROW	L-795	40.02562	-110.0272
150	GMBU D-31-8-17	ARROW	L-795	40.08373	-110.05071
151	GMBU K-18-9-17	ARROW	L-795	40.03253	-110.03679
152	GMBU G-31-8-17	ARROW	L-795	40.07993	-110.05564
153	GMBU C-31-8-17	ARROW	L-795	40.08367	-110.0507
154	GMBU N-30-8-17	ARROW	L-795	40.09108	-110.05527
155	GMBU H-35-8-17	ARROW	L-795	40.07596	-109.97152
156	GMBU I-35-8-17	ARROW	L-795	40.07601	-109.97147
157	GMBU V-31-8-17	ARROW	L-795	40.06526	-110.04605
158	GMBU L-35-8-17	ARROW	L-795	40.07608	-109.96618
159	GMBU O-36-8-17	ARROW	L-795	40.07613	-109.96615

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160	GMBU X-24-8-17	ARROW	L-795	40.09403	-109.95653
161	GMBU P-36-8-17	ARROW	L-795	40.07262	-109.96608
162	GMBU S-35-8-17	ARROW	L-795	40.0726	-109.96615
163	GMBU W-24-8-17	ARROW	L-795	40.09406	-109.95646
164	GMBU S-30-8-17	ARROW	L-795	40.08712	-110.04624
165	GMBU H-25-8-17	ARROW	L-795	40.09102	-109.95159
166	GMBU M-30-8-17	ARROW	L-795	40.09071	-110.04622
167	GMBU Q-24-8-17	ARROW	L-795	40.09802	-109.96119
168	GMBU G-25-8-17	ARROW	L-795	40.09418	-109.96116
169	GMBU L-30-8-17	ARROW	L-795	40.09073	-110.04152
170	GMBU N-24-8-17	ARROW	L-795	40.10487	-109.962
171	GMBU G-24-8-17	ARROW	L-795	40.1049	-109.96195
172	GMBU U-19-8-17	ARROW	L-795	40.0945	-110.03666
173	GMBU I-30-8-17	ARROW	L-795	40.09445	-110.04615
174	GMBU P-25-8-17	ARROW	L-795	40.083811	-109.96142
175	GMBU Q-25-8-17	ARROW	L-795	40.083755	-109.961439
176	GMBU F-25-8-17	ARROW	L-795	40.09047	-109.9652
177	GMBU N-7-9-17	ARROW	L-795	40.04731	-110.05128
178	GMBU Y-24-8-17	ARROW	L-795	40.09384	-109.9651
179	GMBU G-7-9-17	ARROW	L-795	40.04708	-110.05536
180	GMBU G-32-8-18	ARROW	L-795	40.07661	-109.92382
181	GMBU O-25-8-17	ARROW	L-795	40.09048	-109.96513
182	GMBU N-25-8-17	ARROW	L-795	40.08786	-109.96191
183	GMBU U-6-9-17	ARROW	L-795	40.05068	-110.03731
184	GMBU N-32-8-18	ARROW	L-795	40.07656	-109.92384
185	GMBU X-5-9-17	ARROW	L-795	40.05067	-110.03723
186	GMBU F-8-9-17	ARROW	L-795	40.05054	-110.04154
187	GMBU Q-22-8-17	ARROW	L-795	40.09777	-109.99838
188	GMBU Q-23-8-17	ARROW	L-795	40.10135	-109.97994
189	GMBU V-6-9-17	ARROW	L-795	40.0506	-110.04155
190	GMBU N-23-8-17	ARROW	L-795	40.10138	-109.97987
191	GMBU O-29-8-17	ARROW	L-795	40.08711	-110.04154
192	GMBU 3-14-9-18H	ARROW	L-795	40.0364417	-109.8625856
193	GMBU H-31-8-17	ARROW	L-795	40.07639	-110.04584
194	GMBU R-6-9-17	ARROW	L-795	40.05557	-110.05006
195	GMBU P-29-8-17	ARROW	L-795	40.08707	-110.04148
196	GMBU F-32-8-17	ARROW	L-795	40.07982	-110.04138
197	GMBU S-7-9-17	ARROW	L-795	40.04042	-110.04524
198	GMBU 2A-32T-8-17H	ARROW	L-795	40.0787528	-110.0283724
199	GMBU E-17-9-17	ARROW	L-795	40.03993	-110.04148
200	GMBU B-18-9-17	ARROW	L-795	40.03996	-110.04155

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201	GMBU I-23-8-17	ARROW	L-795	40.10866	-109.97154
202	GMBU L-23-8-17	ARROW	L-795	40.10551	-109.97101
203	GMBU B-32-8-17	ARROW	L-795	40.08343	-110.02723
204	GMBU I-18-9-17	ARROW	L-795	40.03311	-110.04191
205	GMBU C-32-8-17	ARROW	L-795	40.08337	-110.02726
206	GMBU K-23-8-17	ARROW	L-795	40.10203	-109.96659
207	GMBU B-31-8-17	ARROW	L-795	40.083472	-110.046271
208	GMBU L-18-9-17	ARROW	L-795	40.03305	-110.04192
209	GMBU S-23-8-17	ARROW	L-795	40.10197	-109.9666
210	GMBU S-18-9-17	ARROW	L-795	40.02554	-110.04623
211	GMBU L-33-8-17	ARROW	L-795	40.07646	-110.00862
212	GMBU M-33-8-17	ARROW	L-795	40.07645	-110.0087
213	GMBU R-18-9-17	ARROW	L-795	40.02559	-110.04626
214	GMBU G-33-8-17	ARROW	L-795	40.0803	-110.01329
215	GMBU H-33-8-17	ARROW	L-795	40.08034	-110.01323
216	GMBU R-35-8-17	ARROW	L-795	40.07277	-109.97471
217	GMBU H-18-9-17	ARROW	L-795	40.03255	-110.05097
218	GMBU U-29-8-17	ARROW	L-795	40.07982	-110.01721
219	GMBU X-28-8-17	ARROW	L-795	40.07985	-110.01715
220	GMBU R-19-8-17	ARROW	L-795	40.10156	-110.04619
221	GMBU M-35-8-17	ARROW	L-795	40.07283	-109.97469
222	GMBU M-18-9-17	ARROW	L-795	40.032497	-110.0509332
223	GMBU S-4-9-17	ARROW	L-795	40.05828	-110.00842
224	GMBU I-33-8-17	ARROW	L-795	40.0764	-110.00448
225	GMBU N-36-8-17	ARROW	L-795	40.07638	-109.96103
226	GMBU O-34-8-17	ARROW	L-795	40.07634	-110.0045

Engines on State land

	Well Name	Make	Model	Latitude	Longitude
227	LAMB 6-34-4-1E	ARROW	L-795	40.093513	-109.871175
228	MON BT NE I-25-8-16	ARROW	L-795	40.09071	-110.05991
229	MON BUTTE NE QA-25-8-16	ARROW	L-795	40.086747	-110.07404
230	W POINT K-7-9-16	ARROW	L-795	40.04364	-110.154241
231	S WELLS DRW U-5-9-16	ARROW	L-795	40.050675	-110.130805
232	S WELLS DRW X-4-9-16	ARROW	L-795	40.054572	-110.125823
233	FEDERAL G-34-8-16	ARROW	L-795	40.076161	-110.107294
234	ASHLEY M-15-9-15	ARROW	L-795	40.029463	-110.2200942
235	ASHLEY N-14-9-15	ARROW	L-795	40.029133	-110.205816
236	W POINT G-6-9-16	ARROW	L-795	40.061721	-110.163699
237	JONAH T-11-9-16	ARROW	L-795	40.039937	-110.079005
238	UTE TRIBAL 5-11-4-1E	ARROW	L-795	40.15165	-109.85627

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239	UTE TRIBAL 12-25-4-3	ARROW	L-795	40.1039	-110.17712
240	UTE TRIBAL 4-25-4-3	ARROW	L-795	40.11175	-110.17785
241	MON BT O-35-8-16	ARROW	L-795	40.072553	-110.097636
242	UTE TRIBAL 11-29-4-1E	ARROW	L-795	40.103497	-109.908078
243	MON BT I-34-8-16	ARROW	L-795	40.079784	-110.102408
244	ASHLEY K-15-9-15	ARROW	L-795	40.033374	-110.210902
245	ASHLEY I-15-9-15	ARROW	L-795	40.036197	-110.214656
246	ASHLEY F-14-9-15	ARROW	L-795	40.036308	-110.205854
247	MOON 3A-29-4-2	ARROW	L-795	40.1107877	-110.1392378
248	UTE TRIBAL 3-25-4-3	ARROW	L-795	40.11158	-110.17303
249	ASHLEY P-12-9-15	ARROW	L-795	40.03998	-110.191711
250	MOON 3-20-4-2	ARROW	L-795	40.1190334	-110.1399244
251	ASHLEY S-12-9-15	ARROW	L-795	40.0407	-110.1727
252	ASHLEY R-15-9-15	ARROW	L-795	40.028594	-110.215172
253	ASHLEY Q-15-9-15	ARROW	L-795	40.024955	-110.218951
254	MON BT NE R-25-8-16	ARROW	L-795	40.083198	-110.064114
255	MON BT NE B-25-8-16	ARROW	L-795	40.09793	-110.060022
256	S WELLS DRW S-4-9-16	ARROW	L-795	40.054552	-110.116694
257	S WELLS DRW W-4-9-16	ARROW	L-795	40.054561	-110.120913
258	SO MON BUTTE P-2-9-16	ARROW	L-795	40.054437	-110.093224
259	SO MON BUTTE X-2-9-16	ARROW	L-795	40.054492	-110.093202
260	MON BUTTE M-2-9-16	ARROW	L-795	40.05804	-110.088254
261	SO MON BUTTE N-2-9-16	ARROW	L-795	40.057996	-110.088304
262	JONAH G-11-9-16	ARROW	L-795	40.050171	-110.092849
263	JONAH M-12-9-16	ARROW	L-795	40.043879	-110.070141
264	GREATER MB V-2-9-16	ARROW	L-795	40.054661	-110.083661
265	SO MON BUTTE W-2-9-16	ARROW	L-795	40.054634	-110.083729
266	MON BUTTE EAST Q-36-8-16	ARROW	L-795	40.069037	-110.073472
267	MON BUTTE EAST R-36-8-16	ARROW	L-795	40.069396	-110.065206
268	GREATER MB B-1-9-16	ARROW	L-795	40.06947	-110.06521
269	MON BUTTE G-2-9-16	ARROW	L-795	40.065545	-110.093006
270	UTE TRIBAL 6A-29-4-1E	ARROW	L-795	40.108598	-109.913389
271	MON BUTTE V-35-8-16	ARROW	L-795	40.06537	-110.083442
272	MON BUTTE W-35-8-16	ARROW	L-795	40.06537	-110.083442
273	MON BT S-24-8-16	ARROW	L-795	40.101723	-110.064545
274	GREATER MB K-36-8-16	ARROW	L-795	40.072582	-110.06014
275	MON BUTTE EAST H-36-8-16	ARROW	L-795	40.076455	-110.064699
276	MON BUTTE EAST G-36-8-16	ARROW	L-795	40.076204	-110.069073
277	MON BUTTE EAST J-36-8-16	ARROW	L-795	40.079329	-110.059775
278	FENCELINE F-24-8-16	LUFKIN	H-795	40.105752	-110.078381
279	GMBU A-36-8-16	ARROW	L-795	40.079376	-110.059729

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280	MON BUTTE EAST M-36-8-16	ARROW	L-795	40.076248	-110.069022
281	FENCELINE G-24-8-16	LUFKIN	H-795	40.105154	-110.069614
282	MON BUTTE EAST B-36-8-16	ARROW	L-795	40.079969	-110.064746
283	MON BUTTE EAST C-36-8-16	ARROW	L-795	40.079911	-110.06475
284	GREATER MB C-1-9-16	ARROW	L-795	40.06924	-110.068191
285	MON BUTTE G-35-8-16	ARROW	L-795	40.076657	-110.088262
286	GMBU 14-36-8-15H	ARROW	L-795	40.0686333	-110.1817912
287	MON BUTTE I-2-9-16	ARROW	L-795	40.06501	-110.07922
288	GREATER MB F-1-9-16	ARROW	L-795	40.06506	-110.07917
289	ASHLEY G-12-9-15	ARROW	L-795	40.05098	-110.18714
290	MON BT NE L-25-8-16	ARROW	L-795	40.09064	-110.06461
291	UTE TRIBAL 9-29-4-1E	ARROW	L-795	40.10442	-109.90334
292	ASHLEY O-12-9-15	ARROW	L-795	40.047212	-110.191852
293	MON BT L-34-8-16	ARROW	L-795	40.072493	-110.102352
294	MON BUTTE H-35-8-16	ARROW	L-795	40.079834	-110.087982
295	ASHLEY S-11-9-15	ARROW	L-795	40.043678	-110.196406
296	ASHLEY H-15-9-15	ARROW	L-795	40.032422	-110.218718
297	FEDERAL 4-30-9-16	ARROW	L-795	40.00708	-110.16316
298	SCHWAB-STOLLMACK 4-24-4-1	ARROW	L-795	40.12583	-109.95091
299	UTE TRIBAL 13-23-4-3	ARROW	L-795	40.11515	-110.19675
300	FEDERAL 5-28-8-16	ARROW	L-795	40.090335	-110.130986
301	FEDERAL 8-25-8-15	ARROW	L-795	40.09024	-110.17204
302	UTE TRIBAL 15-14-4-3	ARROW	L-795	40.1289	-110.18679
303	UTE TRIBAL 12-23-4-3	ARROW	L-795	40.11858	-110.19677
304	HANCOCK 8-24-4-1	ARROW	L-795	40.12212	-109.93551
305	FEDERAL 14-25-8-15	ARROW	L-795	40.08321	-110.18157
306	MON BUTTE S-35-8-16	ARROW	L-795	40.07213	-110.08401
307	FEDERAL 2-30-8-16	ARROW	L-795	40.09425	-110.15958
308	MON BUTTE R-35-8-16	ARROW	L-795	40.07212	-110.08878
309	MON BUTTE NE N-25-8-16	ARROW	L-795	40.08745	-110.06901
310	MON BUTTE L-2-9-16	ARROW	L-795	40.06134	-110.07813
311	GREATER MB P-36-8-16	ARROW	L-795	40.0727688	-110.07882
312	HAWKEYE FED X-26-8-16E	ARROW	L-795	40.0799	-110.08791
313	GREATER MB O-1-9-16	ARROW	L-795	40.06132	-110.07806
314	HAWKEYE FED N-26-8-16	ARROW	L-795	40.08697	-110.09288
315	M BUTTE NE FED V-26-8-16	ARROW	L-795	40.07986	-110.07877
316	WELLS DRW L-5-9-16	ARROW	L-795	40.0621	-110.13529
317	GRTR MB Q-34-8-16	ARROW	L-795	40.06904	-110.10721
318	JONAH P-14-9-16	ARROW	L-795	40.024917	-110.09712
319	GMBU A-10-9-16	ARROW	L-795	40.05432	-110.09787
320	GMBU O-2-9-16	ARROW	L-795	40.06126	-110.09713

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321	GMBU S-11-9-16	ARROW	L-795	40.04349	-110.08367
322	GRTR MB B-3-9-16	ARROW	L-795	40.0688	-110.09791
323	GRTR MB E-2-9-16	ARROW	L-795	40.06883	-110.09785
324	MON BUTTE F-2-9-16	ARROW	L-795	40.06129	-110.09707
325	JONAH O-12-9-16	ARROW	L-795	40.047081	-110.074164
326	MON BUTTE S-34-8-16	ARROW	L-795	40.07255	-110.10233
327	GRTR MB C-3-9-16	ARROW	L-795	40.06882	-110.10261
328	GRTR MB R-34-8-16	ARROW	L-795	40.06886	-110.10256
329	MON BUTTE J-25-8-16	ARROW	L-795	40.09085	-110.05985
330	MON BUTTE M-34-8-16	ARROW	L-795	40.07617	-110.10251
331	MON BUTTE H-34-8-16	ARROW	L-795	40.07617	-110.10259
332	MON BUTTE R-26-8-16	ARROW	L-795	40.08705	-110.08371
333	FEDERAL 6-28-8-16	ARROW	L-795	40.090627	-110.12616
334	K MOON 2-13-4-3	ARROW	L-795	40.1406667	-110.1675568
335	MON BUTTE S-26-8-16	ARROW	L-795	40.083	-110.07884
336	UTE TRIBAL 2-27-4-3	ARROW	L-795	40.11193	-110.20601
337	GMBU 3-36-8-15H	ARROW	L-795	40.079591	-110.181658
338	GMBU G-25-8-16	ARROW	L-795	40.09044	-110.06888
339	GRTR MB B-34-8-16	ARROW	L-795	40.08372	-110.10245
340	MON BUTTE C-34-8-16	ARROW	L-795	40.08368	-110.10251
341	GMBU E-35-8-16	ARROW	L-795	40.08345	-110.09762
342	GMBU P-26-8-16	ARROW	L-795	40.08349	-110.09758
343	GRTR MB S-27-8-16	ARROW	L-795	40.08708	-110.09766
344	MON BUTTE D-25-8-16	ARROW	L-795	40.09792	-110.06941
345	MON BUTTE R-24-8-16	ARROW	L-795	40.09796	-110.06469
346	UTE TRIBAL 7-27-4-3	ARROW	L-795	40.10776	-110.2059
347	GMB O-26-8-16	ARROW	L-795	40.09068	-110.09299
348	UTE TRIBAL 3-16-4-2	ARROW	L-795	40.14041	-110.11602
349	MON BUTTE P-25-8-16	ARROW	L-795	40.0868	-110.07405
350	MONUMENT BUTTE 3-32-8-16H	ARROW	L-795	40.08057	-110.145949
351	MEAGHER 9-20-4-2	ARROW	L-795	40.11906	-110.12576
352	UTE TRIBAL 6-7-4-2	ARROW	L-795	40.15122	-110.15367
353	HAWKEYE FED W-26-8-16	ARROW	L-795	40.07971	-110.08367
354	UTE TRIBAL 10-7-4-2W	ARROW	L-795	40.14743	-110.15039
355	UTE TRIBAL 8-17-4-2	ARROW	L-795	40.1368	-110.12553
356	GMBU E-25-8-16	ARROW	L-795	40.09791	-110.07413
357	MON BUTTE P-24-8-16	ARROW	L-795	40.09796	-110.07408
358	GMBU H-1-9-16	ARROW	L-795	40.06524	-110.06476
359	GMBU T-34-8-16	ARROW	L-795	40.07201	-110.09272
360	GMBU E-1-9-16	ARROW	L-795	40.06492	-110.07428
361	GMBU 3-36-8-16H	ARROW	L-795	40.080639	-110.069142

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362	UTE TRIBAL 9-3-4-1E	ARROW	L-795	40.16189	-109.86106
363	GMBU D-1-9-16	ARROW	L-795	40.06495	-110.07422
364	GMBU D-36-8-16	ARROW	L-795	40.08346	-110.07416
365	GMBU N-1-9-16	ARROW	L-795	40.061783	-110.074114
366	GRTR MB E-36-8-16	ARROW	L-795	40.08342	-110.07421
367	UTE TRIBAL 5-2-4-1E	ARROW	L-795	40.16605	-109.85628
368	MON BUTTE C-26-8-16	ARROW	L-795	40.09791	-110.08826
369	GMBU 3-16-9-16H	ARROW	L-795	40.035347	-110.126368
370	MON BUTTE A-11-9-16	ARROW	L-795	40.05485	-110.07365
371	MON BUTTE M-1-9-16	ARROW	L-795	40.05798	-110.0695
372	MON BUTTE T-2-9-16	ARROW	L-795	40.0548947	-110.0736047
373	UTE TRIBAL 9-2-4-1E	ARROW	L-795	40.16239	-109.84209
374	WELLS DRW D-5-9-16	ARROW	L-795	40.069127	-110.144755
375	UTE TRIBAL 15-2-4-1E	ARROW	L-795	40.1588	-109.84682
376	FEDERAL 16-29-8-16	ARROW	L-795	40.08363	-110.13493
377	UTE TRIBAL 16-18-4-2	ARROW	L-795	40.12959	-110.14446
378	UTE TRIBAL 2-28-4-2	ARROW	L-795	40.112491	-110.111794
379	HAWKEYE 12-23-8-16	ARROW	L-795	40.101761	-110.093068
380	UTE TRIBAL 13-3-4-1E	ARROW	L-795	40.15859	-109.87531
381	WELCH 16-19-4-1E	ARROW	L-795	40.11517	-109.91811
382	UTE TRIBAL 1-11-4-1E	ARROW	L-795	40.15514	-109.84206
383	FRST CHRISTIAN 10-19-4-1E	ARROW	L-795	40.11828	-109.92209
384	FRST CHRISTIAN 11-19-4-1E	ARROW	L-795	40.11931	-109.92764
385	SCHWAB-STOLLMACK 3-24-4-1	ARROW	L-795	40.12517	-109.94694
386	FRST CHRISTIAN 9-19-4-1E	ARROW	L-795	40.1186311	-109.9178221
387	UTE TRIBAL 9-11-4-1E	ARROW	L-795	40.1476737	-109.8418399
388	WELCH 13-19-4-1E	ARROW	L-795	40.11371	-109.93317
389	WELCH 15-19-4-1E	ARROW	L-795	40.11504	-109.92147
390	UTE TRIBAL 3-10-4-1E	ARROW	L-795	40.155326	-109.871158
391	GMBU 14-14T-9-15H	ARROW	L-795	40.025068	-110.1999
392	HANCOCK 12-7-4-1W	ARROW	L-795	40.1469	-110.04372
393	UTE TRIBAL 13-2-4-1E	ARROW	L-795	40.15889	-109.85628
394	UTE TRIBAL 5-3-4-1E	ARROW	L-795	40.16589	-109.87536
395	BECKSTEAD 11-17-4-2W	ARROW	L-795	40.13305	-110.13492
396	UTE TRIBAL 8-16-4-1W	ARROW	L-795	40.137447	-109.993604
397	UTE TRIBAL 15-11-4-1E	ARROW	L-795	40.14426	-109.84676
398	UTE TRIBAL 3-27-4-3	ARROW	L-795	40.11108	-110.21109
399	UTE TRIBAL 13-11-4-1E	ARROW	L-795	40.14431	-109.85625
400	UTE TRIBAL 7-11-4-1E	ARROW	L-795	40.15155	-109.84677
401	UTE TRIBAL 13-10-4-1E	ARROW	L-795	40.14416	-109.875292
402	GMBU K-2-9-15	ARROW	L-795	40.0618231	-110.1915727

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403	STATE 4-36-8-15	ARROW	L-795	40.08004	-110.187632
404	UTE TRIBAL 13-20-4-2E	ARROW	L-795	40.117755	-109.797796
405	UTE TRIBAL 15-10-4-1E	ARROW	L-795	40.144189	-109.865974
406	GMBU W-2-9-15	ARROW	L-795	40.05408	-110.20062
407	UTE TRIBAL 15-3-4-1E	ARROW	L-795	40.15868	-109.86584
408	UTE TRIBAL 3-15-4-1E	ARROW	L-795	40.14048	-109.87047
409	UTE TRIBAL 7-15-4-1E	ARROW	L-795	40.13682	-109.86588
410	BECKSTEAD 14-17-4-2W	ARROW	L-795	40.12919	-110.13495
411	UTE TRIBAL 3-14-4-1E	ARROW	L-795	40.14063	-109.85153
412	UTE TRIBAL 5-14-4-1E	ARROW	L-795	40.13698	-109.8563
413	UTE TRIBAL 6-16-4-1W	ARROW	L-795	40.13715	-110.00314
414	GMBU O-11-9-16	ARROW	L-795	40.04327	-110.09788
415	UTE TRIBAL 7-16-4-1W	ARROW	L-795	40.1374442	-109.9985094
416	UTE TRIBAL 7-14-4-1E	ARROW	L-795	40.137	-109.84679
417	HANCOCK 8-20-4-1W	ARROW	L-795	40.12189	-110.01263
418	RIO GRANDE 15-13-4-1W	ARROW	L-795	40.12895	-109.94161
419	GMBU H-11-9-16	ARROW	L-795	40.04693	-110.08289
420	GMBU I-11-9-16	ARROW	L-795	40.04688	-110.08285
421	GMBU Y-11-9-16	ARROW	L-795	40.03974	-110.0978
422	UTE TRIBAL 11-10-4-1E	ARROW	L-795	40.147367	-109.870759
423	GMBU S-10-9-16	ARROW	L-795	40.03968	-110.10236
424	GMBU T-10-9-16	ARROW	L-795	40.04296	-110.09316
425	GMBU Q-11-9-16	ARROW	L-795	40.04299	-110.0931
426	GMBU C-14-9-16	ARROW	L-795	40.03945	-110.08394
427	GMBU V-1-9-16	ARROW	L-795	40.05113	-110.0649
428	GMBU C-15-9-16	ARROW	L-795	40.03976	-110.10689
429	GMBU R-10-9-16	ARROW	L-795	40.03981	-110.10691
430	GMBU V-32-8-16	ARROW	L-795	40.06874	-110.13514
431	UTE TRIBAL 2-7-4-2	ARROW	L-795	40.15463	-110.1495
432	GMBU U-32-8-16	ARROW	L-795	40.06868	-110.13514
433	GMBU S-2-9-15	ARROW	L-795	40.0542	-110.1965
434	GMBU V-2-9-15	ARROW	L-795	40.05415	-110.19655
435	GMBU S-3-9-16	ARROW	L-795	40.05427	-110.0979
436	WILLIAMS 14-8-4-2W	ARROW	L-795	40.14396	-110.13494
437	GMBU R-3-9-16	ARROW	L-795	40.05397	-110.1027
438	GMBU M-3-9-16	ARROW	L-795	40.0614	-110.10202
439	LAMB 13-10-4-1W	ARROW	L-795	40.14423	-109.98941
440	LAMB 14-2-4-1W	ARROW	L-795	40.15862	-109.96466
441	UTE TRIBAL 15-7-4-1W	ARROW	L-795	40.14381	-110.03663
442	GMBU B-10-9-16	ARROW	L-795	40.05398	-110.10263
443	GMBU L-1-9-16	ARROW	L-795	40.05791	-110.06465

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444	GMBU S-1-9-16	ARROW	L-795	40.05788	-110.06458
445	GMBU W-3-9-16	ARROW	L-795	40.050826	-110.102443
446	GMBU 15-22-9-15H	ARROW	L-795	40.01094	-110.21516
447	GMBU D-10-9-16	LUFKIN	H-795	40.05428	-110.11112
448	GMBU N-3-9-16	ARROW	L-795	40.0579	-110.11114
449	GMBU H-3-9-16	ARROW	L-795	40.06557	-110.1026
450	GMBU I-3-9-16	ARROW	L-795	40.0656	-110.10254
451	GMBU 3-2-9-16H	ARROW	L-795	40.06451	-110.089022
452	GMBU L-4-9-16	ARROW	L-795	40.06173	-110.12124
453	GMBU N-4-9-16	ARROW	L-795	40.05825	-110.12596
454	GMBU M-4-9-16	ARROW	L-795	40.05828	-110.1259
455	GMBU K-5-9-16	ARROW	L-795	40.05809	-110.13086
456	GMBU B-14-9-16	ARROW	L-795	40.04003	-110.07904
457	GMBU F-3-9-16	ARROW	L-795	40.06515	-110.11621
458	GMBU G-3-9-16	ARROW	L-795	40.06208	-110.10749
459	GMBU Q-4-9-16	ARROW	L-795	40.05814	-110.13082
460	GMBU U-33-8-16	ARROW	L-795	40.06495	-110.11147
461	GMBU X-34-8-16	ARROW	L-795	40.06499	-110.11141
462	GMBU C-8-9-16	ARROW	L-795	40.05445	-110.14486
463	GMBU I-15-9-16	ARROW	L-795	40.0365	-110.10278
464	GMBU U-12-9-15	ARROW	L-795	40.03586	-110.17161
465	GMBU H-15-9-16	ARROW	L-795	40.03647	-110.10284
466	GMBU R-11-9-16	ARROW	L-795	40.04022	-110.08805
467	GMBU R-5-9-16	ARROW	L-795	40.05451	-110.14484
468	GMBU W-7-9-16	ARROW	L-795	40.03577	-110.16469
469	GMBU T-5-9-16	ARROW	L-795	40.05448	-110.13099
470	GMBU L-11-9-16	ARROW	L-795	40.04355	-110.08364
471	GMBU V-7-9-16	ARROW	L-795	40.03638	-110.15903
472	GMBU S-5-9-16	ARROW	L-795	40.05497	-110.13606
473	GMBU W-33-8-16	ARROW	L-795	40.06567	-110.12112
474	GMBU E-8-9-16	ARROW	L-795	40.05493	-110.15446
475	GMBU L-3-9-16	ARROW	L-795	40.06136	-110.10198
476	GMBU P-5-9-16	ARROW	L-795	40.05497	-110.15442
477	GMBU D-17-9-16	ARROW	L-795	40.03975	-110.14914
478	GMBU F-7-9-16	ARROW	L-795	40.04716	-110.17292
479	GMBU J-10-9-16	ARROW	L-795	40.0502	-110.09288
480	GMBU U-7-9-16	ARROW	L-795	40.03667	-110.14957
481	GMBU R-2-9-15	ARROW	L-795	40.054124	-110.2005634
482	GMBU M-11-9-16	ARROW	L-795	40.04304	-110.08764
483	GMBU N-11-9-16	ARROW	L-795	40.04299	-110.08768
484	GMBU G-7-9-16	ARROW	L-795	40.04719	-110.16796

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485	GMBU O-7-9-16	ARROW	L-795	40.04712	-110.17287
486	GMBU G-8-9-16	ARROW	L-795	40.050001	-110.149147
487	GMBU P-7-9-16	ARROW	L-795	40.0432	-110.17204
488	GMBU W-6-9-16	ARROW	L-795	40.05101	-110.16295
489	GMBU B-7-9-16	ARROW	L-795	40.05447	-110.15932
490	GMBU X-6-9-16	ARROW	L-795	40.05105	-110.16301
491	GMBU L-2-9-15	ARROW	L-795	40.0618262	-110.197278
492	GMBU H-7A-9-16	ARROW	L-795	40.0471	-110.15829
493	GMBU Q-5-9-16	ARROW	L-795	40.05502	-110.15172
494	GMBU S-6-9-16	ARROW	L-795	40.05451	-110.15927
495	GMBU D-8-9-16	ARROW	L-795	40.05497	-110.15168
496	GMBU L-7-9-16	ARROW	L-795	40.04402	-110.15873
497	Sundance Injection Facility	Cummins	QSK60G	40.04324	-109.934796
498	Sundance Injection Facility	Cummins	QSK60G	40.04324	-109.934796
499	Parriette 4 SWD	Cummins	G5.9	40.039841	-109.820836
500	UTE TRIBAL 3-28-4-2W	AJAX	E-565	40.11183	-110.116277
501	UTE TRIBAL 9-17-4-2	AJAX	E-565	40.13313	-110.12556
502	UTE TRIBAL 9-22-4-2	AJAX	E-565	40.11865	-110.08772
503	UTE TRIBAL 10-17-4-2	AJAX	E-565	40.13355	-110.13008
504	BOUNDARY 14-21-8-17	AJAX	E-565	40.098057	-110.013126
505	UTE TRIBAL 6-17-4-2	AJAX	E-565	40.13632	-110.13478
506	UTE TRIBAL 11-23-4-3	AJAX	E-565	40.1181	-110.19152
507	SCHWABSTOLLMACK 5-19-4-1E	AJAX	E-565	40.12289	-109.93236
508	SCHWABSTOLLMACK 3-19-4-1E	AJAX	E-565	40.1253851	-109.9278501
509	FEDERAL 8-26-8-15	AJAX	E-565	40.09086	-110.19147
510	FEDERAL 10-25-8-15	AJAX	E-565	40.08674	-110.17702
511	FEDERAL 8-23-9-16	AJAX	E-565	40.01851	-110.07839
512	STEWART 3-24-4-2	AJAX	E-565	40.12645	-110.05893
513	RIO GRANDE 10-13-4-1W	AJAX	E-565	40.132855	-109.941777
514	UTE TRIBAL 15-18-4-2	AJAX	E-565	40.12929	-110.14911
515	FEDERAL 16-26-8-15	AJAX	E-565	40.08355	-110.19155
516	FEDERAL 8-29-8-16	AJAX	E-565	40.09111	-110.13567
517	UTE TRIBAL 9-14-4-3	AJAX	E-565	40.133	-110.18228
518	FEDERAL 15-25-8-15	AJAX	E-565	40.08352	-110.17738
519	FEDERAL 3-25-8-15	AJAX	E-565	40.09382	-110.1822
520	UTE TRIBAL 11-14-4-3	AJAX	E-565	40.13254	-110.19203
521	RIO GRANDE 16-13-4-1W	AJAX	E-565	40.129077	-109.937512
522	STATE 1-36-8-15	AJAX	E-565	40.07981	-110.172262
523	BECKSTEAD 13-17-4-2W	AJAX	E-565	40.12928	-110.13967
524	FEDERAL 16-29-8-16	AJAX	E-565	40.08363	-110.13493
525	UTE TRIBAL 11-27-4-3	AJAX	E-565	40.10422	-110.20997

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526	UTE TRIBAL 5-10-4-1E	AJAX	E-565	40.151432	-109.875313
527	FEDERAL 13-25-8-15	AJAX	E-565	40.08352	-110.18687
528	WELCH 14-19-4-1E	AJAX	E-565	40.11577	-109.92751
529	RIO GRANDE 11-13-4-1W	AJAX	E-565	40.13286	-109.94713
530	UTE TRIBAL 8-27-4-3	AJAX	E-565	40.10777	-110.20107
531	RIO GRANDE 13-13-4-1W	AJAX	E-565	40.12972	-109.95174
532	RIO GRANDE 14-13-4-1W	AJAX	E-565	40.12945	-109.94597
533	UTE TRIBAL 1-9-4-1E	AJAX	E-565	40.155509	-109.880086
534	UTE TRIBAL 7-3-4-1E	AJAX	E-565	40.16596	-109.86576
535	UTE TRIBAL 9-27-4-3	AJAX	E-565	40.1042	-110.20128
536	STATE 12-36-8-15	AJAX	E-565	40.072652	-110.186958
537	WILCKEN 16-23-4-2	AJAX	E-565	40.11506	-110.06872
538	UTE TRIBAL 14-18-4-2	AJAX	E-565	40.12935	-110.15432
539	FEDERAL 2-28-8-16	AJAX	E-565	40.093978	-110.120745
540	UTE TRIBAL 7-2-4-1E	AJAX	E-565	40.16608	-109.84684
541	FEDERAL 1-35-8-15	AJAX	E-565	40.07951	-110.19128
542	RIO GRANDE 12-13-4-1W	AJAX	E-565	40.13275	-109.95158
543	GMBU T-4-9-16	AJAX	E-565	40.05786	-110.11108
544	RIO GRANDE 9-13-4-1W	AJAX	E-565	40.132776	-109.936481
545	UTE TRIBAL 12-22-4-2W	AJAX	E-565	40.11759	-110.1032
546	UTE TRIBAL 2-14-4-1W	AJAX	E-565	40.13988	-109.96065
547	UTE TRIBAL 2-27-4-3	ARROW	L795	40.11193	-110.20601
548	Beckstead 14-17-4-2W	ARROW	L795	40.12919	-110.13495
549	Ute Tribal 11-2-4-4W	Cummins	G8.3	40.1618	-110.30656

APPENDIX B: ENGINES WITH LATE TEST REPORT SUBMITTALS

Well Name	Make	Model	Serial #	Lat.	Long.
GMBU M-32-8-18	Arrow	L-795	1-601063	40.07636	-109.91372
GMBU S-32-8-18	Arrow	L-795	L-601067	40.06867	-109.91477
GMBU F-36 8 17	Arrow	L-795	L6-01018	40.076385	-109.961035
GMBU R-32-8-18	Arrow	L-795	1-601068	40.06866	-109.91485
GMBU L-32-8 18	Arrow	L-795	L-601054	40.07642	-109.91369
GMBU D-9-9-17	Arrow	L-795	L-601119	40.05473	-110.01784
GMBU B-30-8-17	Arrow	L-795	L-601105	40.09461	-110.04147
GMBU F-29-8 17	Arrow	L-795	L-601120	40.09465	-110.04142
GMBU H-32 8 18	Arrow	L-795	1-601106	40.07986	-109.91378
GMBU I-32-8-18	Arrow	L-795	L-601055	40.07991	-109.9138
GMBU N-4-9-17	Arrow	L-795	L-601107	40.061693	-110.01318
GMBU G-4-9-17	Arrow	L-795	L-601117	40.061751	-110.013184

APPENDIX C: LATE TRIBAL MINOR NSR REGISTRATIONS

Well Name	First Production Date	Latitude	Longitude
DILLMAN 5-2-3-1W	6/11/2012	40.253	-109.971
GRACE 3-16-3-3WH	7/7/2012	40.228	-110.232
LAMB 12-20-3-1W	11/21/2011	40.205	-110.028
LAMB 9-24-3-2	3/26/2012	40.206	-110.049
NICKERSON 6-28-3-2W	3/19/2012	40.195	-110.117
PADILLA 1-18-3-2W	10/3/2011	40.228	-110.020
PETERSON3-20-3-2W & PETERSON 3-20-3-2WH	11/1/2012	40.216	-110.136
STATE 4-19-3-2WH	7/9/2012	40.214	-110.161
THORNE 4-21-3-2W	3/20/2012	40.214	-110.120

APPENDIX D: EPA APPROVAL LETTER



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

JUN 5 - 2014

Ref: 8ENF- AT
Robert Eales, Air Quality Specialist
Newfield Exploration Company
1001 Seventeenth Street, Suite 2000
Denver, Colorado 80202

Re: Request for Equivalent Calculation Method and Shorter Sampling Times: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines 40 C.F.R. Part 60, Subpart JJJ

Dear Mr. Eales:

This letter is in response to Newfield Production Company's (Newfield's) letter dated April 30, 2014, requesting the use of the manufacturer's specific fuel consumption based on the higher heating value of the fuel consumed during the test and shorter sampling times for pumping unit engines located on State of Utah and Ute Indian lands. These engines are subject to the requirements of 40 C.F.R. Part 60, Subpart JJJ (Appendix A).

Newfield operates 546 (see Appendix A) non-certified, less than 500 horse power, spark ignition (SI) engines subject to initial performance testing per 40 C.F.R. § 60.4243(f). Newfield is requesting the use of the manufacturer's specific fuel consumption based on the higher heating value of the fuel consumed during the test per the State of Wyoming Air Quality Division Portable Analyzer Monitoring Protocol (Wyoming's Portable Analyzer Protocol) in lieu of the Method 19 prescribed in Subpart JJJ. Reference Method 19 calculates a heat input rate per unit of horsepower using a fuel flow meter installed on the engine. However, these smaller engines do not routinely have fuel flow meters installed. Wyoming's Portable Analyzer Protocol recognizes this standard lack of fuel flow meters on small engines and allows for the use of the manufacturer's specific fuel consumption based on the higher heating value of the fuel consumed during the test as opposed to calculating using the engine's fuel flow meter.

Additionally, Newfield would like a reduction in test run times from three 1-hour runs to a single 21 minute run, also per Wyoming's Portable Analyzer Protocol.

As of the latest reported date of violations, January 29, 2013, neither the State of Utah nor the Ute Indian Tribe had been delegated the updated NSPS JJJ rule (78 FR 6697, Jan. 30, 2013). Thus, the U.S. Environmental Protection Agency (EPA) has authority to grant both requests per 40 C.F.R. §§ 60.8(b)(2) and (b)(5), "Performance tests shall be conducted and data reduced in accordance with the test methods and procedures contained in each applicable subpart unless the

In the Matter of: Newfield Production Company

Administrator... (2) approves the use of an equivalent method... (5) approves shorter sampling times and smaller sample volumes when necessitated by process variables or other factors.” The EPA, in coordination with the State of Utah, by this letter, approves the requested equivalent use of the manufacturer’s specific fuel consumption based on the higher heating value of the fuel consumed during the test and shorter sampling times for the engines identified in Appendix A of this letter.

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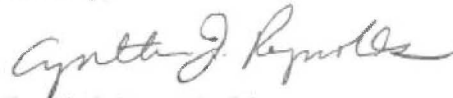
Determination

Based on the lack of fuel flow meters and the validity of the use of the manufacturer’s specific fuel consumption based on the higher heating value of the fuel consumed during the test as proven by its acceptance in the Wyoming Portable Analyzer Protocol, the EPA agrees with the use of the equivalent heat input rate per unit of horsepower using manufacture data for the engines listed in Appendix A.

Additionally, the reduced sampling time will result in a valid portable analyzer parts per million pollutant concentration regardless of the amount of time the test is performed.

If you have any further questions regarding this determination, please contact Alex North, Technical Enforcement Program, at (303) 312-7005.

Sincerely,



Cynthia J. Reynolds, Director
Air & Toxics Technical Enforcement Program

Enclosure

cc: Jay Morris, Utah Division of Air Quality