



V1.4

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
OFFICE OF OIL AND GAS MANAGEMENT

DEP USE ONLY	
Inspection Record #:	3224128
Enforcement Record #:	
Complaint Record #:	355496

SURFACE ACTIVITIES INSPECTION REPORT

DEP Office	New Stanton Oil & Gas Office	Inspection Type	PF
Address	131 Broadview Road	Permit or Reg. #	125 - 28120
Addr Cont	New Stanton, PA 15672	ESCGP #	
Oper. Name	EQT PROD CO	Site #	732761
Oper. Address	400 WOODCLIFF DR, CANONSBURG, PA, 15317-5851	Project #	
Resp. Official Name		Farm Name & Well #	HARBISON 592597
Resp. Official Phone		Other Info	
Latitude	40.22894	Longitude	-80.03195
County	Washington	Municipality	Nottingham Township
Incident Latitude:	40.228942	Incident Longitude:	-80.031947

Inspection Code	INCDT - Incident- Response to Accident or Event	Facility	
Permits / Auth	Well Permit	Site Phase	Restored/Prod
Well Info	Unconventional	Well Kind & Description	

REMARKS:

On March 30, 2021, I conducted an incident response inspection at the Vivan Harbison Well Site in Nottingham Township, Washington County. The inspection was conducted in response to a reportable release received on 3/24/2021 (CTS 355496). The initial report indicated that approximately 40 gallons of produced water was spilled to the well pad.

At the time of inspection, I observed a roll off box dated 3/24/2021 and liquid material located on the steel plates under the gas production units located on the south side of the well pad. According to the EQT representatives on site, the spill on 3/24/2021 was stopped and remediation began. The liquid material I observed was related to a new spill discovered shortly before I arrived on site. The 3/24/2021 spill occurred from the GPU 592603B. The release that was discovered prior to my arrival on site appeared to emanate from GPU 592605A. According to the SPSI representatives the spill that occurred on 3/24/2021 was remediated and the impacted material was placed in the roll off box awaiting disposal.

I recommend that the Operator investigate the possibility of moving the GPUs and investigate impact that the spill had on the material under the GPUs. I noted that that the latest spill is the latest in a series of spills that have occurred between 10/5/2020 and 3/25/2021 at this well site and all have been associated with separate GPUs on site. The GPUs are currently under and COA related to secondary containment and recommend if possible that these GPU be moved up the list for placement of secondary containment due to the frequency of spills associated at the site specifically related to the GPUs. SPSI indicated that the Operator would be utilizing act 2 for remediation.

No impact of waters of the commonwealth observed or suspected. The spills appeared to contained to the gravel well pad surface.

Violations are being issued based on my observation made during the inspection.

Category	Subcategory	Inspection Remarks / Violations / Violation Remarks	I	R	V
Spills & Releases	Reporting / Remediating Releases		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Continuing: No	Violation: 91.34(A) - Failure to take necessary measures to prevent the substances from directly or indirectly reaching waters of this Commonwealth, through accident, carelessness, maliciousness, hazards of weather or from another cause. Violations Date: 03-30-2021 Violation Remarks:			
Waste Control & Disposal	Production Fluids Control & Storage		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Continuing: No	Violation:			

78A57(A)___ - Operator discharged brine and other fluids on or into the ground or into the waters of this Commonwealth.

Violations Date: 03-30-2021

Violation Remarks:

Waste Management General
Continuing: No



Violation:

78a54 - Operator failed to control and dispose of fluids, residual waste and drill cuttings, including top hole water, brines, drilling fluids, drilling muds, stimulation fluids, well servicing fluids, oil, and production fluids in a manner that prevents pollution of the waters of the Commonwealth and in accordance with 25 Pa. Code §§ 78a.55 – 78a.58 and 78a.60 – 78a.63.

Violations Date: 03-30-2021

Violation Remarks:

Continuing: No

Violation:

SWMA 301 - Person operated a residual waste processing or disposal facility without obtaining a permit for such facility from DEP. Person stored, transported, processed, or disposed of residual waste inconsistent with or unauthorized by the rules and regulations of DEP.

Violations Date: 03-30-2021

Violation Remarks:

Well Site Secondary Containment



Inspection Results	Files Attached	Photos Attached	Date Inspected
VIOLS - Violation(s) Noted	<input type="checkbox"/>	<input checked="" type="checkbox"/>	03-30-2021 11:10 AM

INSPECTOR SIGNATURE



SAMUEL STEINGRABE, Water Quality Specialist

Arrival Date: 03/30/2021 11:10 AM

Depart Date: 03/30/2021 12:00 PM

Notice of Violation(s)	
Citation	Description of Violation
25 Pa. Code § 91.34(a)	91.34(A) ACTIVITIES UTILIZING POLLUTANTS - Failure to take necessary measures to prevent the substances from directly or indirectly reaching waters of this Commonwealth, through accident, carelessness, maliciousness, hazards of weather or from another cause.
35 P.S. § 6018.301	SWMA 301 MANAGEMENT OF RESIDUAL WASTE - Person operated a residual waste processing or disposal facility without obtaining a permit for such facility from DEP. Person stored, transported, processed, or disposed of residual waste inconsistent with or unauthorized by the rules and regulations of DEP.
25 Pa. Code § 78a.54	78a54 GENERAL REQUIREMENTS - Operator failed to control and dispose of fluids, residual waste and drill cuttings, including tophole water, brines, drilling fluids, drilling muds, stimulation fluids, well servicing fluids, oil, and production fluids in a manner that prevents pollution of the waters of the Commonwealth and in accordance with 25 Pa. Code §§ 78a.55 – 78a.58 and 78a.60 – 78a.63.
25 Pa. Code § 78a.57(a)	78A57(A)___ CONTROL, STORAGE AND DISPOSAL OF PRODUCTION FLUIDS - Operator discharged brine and other fluids on or into the ground or into the waters of this Commonwealth.
<p>Note: This Notice of Violation is neither an order nor any other final action of the Department of Environmental Protection. It neither imposes nor waives any enforcement action available to the Department under any of its statutes. If the Department determines that an enforcement action is appropriate, you will be notified of the action.</p>	
<p>58 Pa.C.S. § = Act 13(OGA) • 25 Pa.Code § • 35 P.S. § 6018. = Solid Waste Management Act • 35 P.S. § 691. = Clean Streams Law</p>	

Instructions Response	
<input checked="" type="checkbox"/>	You are requested to respond as indicated below by 08/09/2021. If applicable, please include the description of activities you will pursue to achieve compliance with the statutes or regulations cited above. Address your reply to the DEP representative named below.
<input type="checkbox"/>	No further response required at this time
<input checked="" type="checkbox"/>	Written response requested
<input checked="" type="checkbox"/>	Has to be done (Specify in the comment section below)
<input checked="" type="checkbox"/>	Add what you will do to correct the situation and achieve compliance?
<input checked="" type="checkbox"/>	Include explanation of cause of violations
<input checked="" type="checkbox"/>	Include the schedule or anticipated time frame for compliance activities you intend to carry out

Comments:
The Department requests an electronic NOV response is provided to:
EGM April Weiland - apweiland@pa.gov
WQSS Samantha Foulk - sfoulk@pa.gov
WQS Sam Steingrabe - ssteingrab@pa.gov

Permit Reg. No.	Violation Date	DEP Rep	Cert Mail #	Mail Date
	03-30-2021	SAMUEL STEINGRABE		

Inspection Images

image1624648401819



Lat: 40.22966667000001, Long: -80.03205 03/30/2021 11:12:42 AM

Photo # 1: GPUs

image1624648404346



Lat: 40.22891167, Long: -80.03231117 03/30/2021 11:13:48 AM

Photo # 2: spill material on GPU

ilimage1624648409232



.at: 40.229675, Long: -80.03205 03/30/2021 11:23:32 AM

Photo # 3: fluid between GPUs

ilimage1624648411974



.at: 40.228916670000004, Long: -80.03231117 03/30/2021 11:23:41 AM

Photo # 4: fluid between GPUs

image1624648417404



Photo # 5: fluid between GPUs

image1624648419938



Photo # 6: previous remediation in front of GPUs

ilimage1624648422489



Lat: 40.22888, Long: -80.03221950000001 03/30/2021 11:45:34 AM

Photo # 7: fluid between GPUs

ilimage1624648444192



Lat: 40.22877833, Long: -80.0322805 03/30/2021 11:55:21 AM

Photo # 8: roll of box dated 3/24/2021

image1624648449022



Photo # 9: back side of GPUs

image1624648453734



Photo # 10: back site of GPUs

ilimage1624648456162



Photo # 11: back side of GPUs