




MEMORANDUM

TO: **FILE – FOURPOINT RESOURCES, LLC – Ute Tribal 9-3-4-1E**

THROUGH: Rik Ombach, Minor Source Oil and Gas Section Manager 

FROM: Chris Jensen, Environmental Scientist 


DATE: January 16, 2026

SUBJECT: **OIL AND GAS PERMIT-BY-RULE EVALUATION**

INSPECTION DATE: January 7, 2026

SOURCE LOCATION: Lat: 40.1620496941179, Long: -109.86180613071
Uintah County

Business Office:
FourPoint Resources, LLC
100 Saint Paul Street, Suite 400
Denver, CO 80206

SOURCE TYPE: Tank Battery
API: 4304751289

SOURCE CONTACTS: Brad Rowser, Field Contact
Phone: 435-503-5360, Email: browser@fourpointresources.com
Brandon Lithgoe, Corporate Environmental Contact
Phone: 281-847-6093, Email: Brandon.Lithgoe@ovintiv.com
Jeanette Liang, Corporate Environmental Contact
Phone: 720-728-6447, Email: jliang@fourpointenergy.com

OPERATING STATUS: Operating

PROCESS DESCRIPTION: Oil and gas products are brought to the surface. These products go through a separator where the oil and any water products are sent to storage tanks and the gas is used to power equipment on site (pump jack engine, tank heater, separator, flare, combustor, etc.) Any remaining gas is sent to a pipeline that feeds a local gas plant. The oil and process water in the storage tanks is loaded into tanker trucks and hauled off site for processing and disposal.

APPLICABLE REGULATIONS: Utah Administrative Code (UAC) R307-500 Series for the Oil and Gas Industry, and UAC R307-201: Emission Standards: General Emission Standards; and UAC R307-150: Emission Inventories. Federal Subpart: 40 CFR 60 Subpart JJJJ.

SOURCE EVALUATION:

Site Type: PBR-Uncontrolled
No Flare Controls, Site powered by Engine.
The source registered: 1,000 Estimated Oil BBL.
DOGM current 12 month rolling production is: 832 BBLs.
Utah Statute R307-506 requires a source with throughput greater than 8,000 BBLs to have controls.

REGISTERED EQUIPMENT:

Engine - 2-Stroke Lean Burn Arrow, L-795 Mfg Yr 2011, 55 HP, Nat Gas, Pneumatic, Tank

General Provisions

Visible emissions are within the following opacity limits: VOC Control Devices and Gasoline engines 0%, Diesel engines 20%, Natural Gas Engines and Boilers, Treater burners & Tank burners 10%, Mobile source dust 10%. [R307-201-3]

In Compliance. No visible emissions were detected by use of the USEPA Method 9.

VOC emissions are, at all times, minimized as reasonably practicable by equipment design, maintenance and operation practices. [R307-501-4(1)]

In Compliance. Associated gas is routed to a sales gathering line. Tanks all have thief hatches and PRV's that are closed and not leaking. The expected components were found installed. The DAQ observed the installation for a cycle and it seems to be operating as expected.

All natural gas-driven pneumatic controllers are in compliance with 40CFR 60.5390 or 60.5390a as applicable. Tagging and record keeping requirements are not required. [R307-502-4]

In Compliance. The natural gas-driven pneumatic controllers at this source are not continuous bleed but are low-bleed or snap acting.

Tank Truck Loading

Truck loading is done by bottom filling or submerged fill pipe. [R307-504(1)]

In Compliance. The truck loading area is suitable for submerged loading and it is routine for truck drivers to load this way.

Storage Vessels

Thief hatches are kept closed and latched. [R307-506-4(1)]

In Compliance. All hatches were found closed at the start of the evaluation.

Vessel Vent Components: (valves, unions, pressure relief devices, etc.) are leak-free, in good repair, and working as intended. (Tank covers are leak free and form a continuous seal.). [R307-501-4]

In Compliance. No leaking components were found during the survey. The components were all operated and installed as expected.

Natural Gas Engines

Affected engine exhaust vents are vertical and unrestricted.

Stacks are 8' or greater if the site horsepower rating is 151 to 305

Stacks are 10' or greater if the site horse power rating is 306 or greater. [R307-510-4(3)]

In Compliance. This well was drilled before 2016 and the pumpjack engine is instead subject to the performance standards in NSPS (60) JJJJ.

Associated Gas Flaring

Associated gas is routed to a process unit for combustion, a sales pipeline or an operating VOC control device, except in an emergency.

An emergency release is unanticipated, temporary, infrequent, unavoidable, =24 hrs. and is not due to operator negligence.

Low pressure gas from working loss, breathing loss and oil flashing is not "associated gas".
[R307-511-4(1)]

In Compliance. Associated gas is gathered to a sales line.

Recording Keeping Requirements

Emission Inventory

An emissions inventory has been submitted within the past three years. [R307-150-9(1)]

In Compliance. The operator submitted for the 2023 emissions inventory.

Oil and Gas Industry Registration Requirement

The source is registered with the DAQ. [R307-505-3(3)]

In Compliance.

Registration has been updated within 30 days of a company name change, removal or addition of control devices, or termination of operations. [R307-505-3(3)]

In Compliance.

Natural Gas Engines

Engines subject to R307-510 shall be certified or have an initial performance test per CFR 60.4244.
[R307-510-4(2)]

Not Applicable. This source was drilled before 2016 and is not subject to this rule's standards.

Engine certifications or initial performance tests required are kept for the life of the engine at the source.
[R307-510-5]

Not Applicable. Engines installed before 2016 are not subject to R307-510 and are not under obligation to retain certifications or stack tests for life.

Certified and non-certified engines are regularly maintained according to the Engine manufacturer's Schedule or the Maintenance Plan. [40 CFR 60 Subpart IIII, JJJJ, 63 Subpart ZZZZ]

In Compliance. A maintenance plan has been drafted and followed.

Associated Gas Flaring

The following records are kept:

The time and date of event

Volume of emissions

Any corrective action taken for 3 years. [R307-511-5(1)(a)(b)]

In Compliance. No reported venting or breakdowns.

Applicable Federal Regulations

NSPS (Part 60) JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines [40 CFR 60 Subpart JJJJ]

In Compliance. The engine (ArrowL795) installed at this source is not certified and may have not had an initial performance test. The retention time for this document has expired. A maintenance plan has been drafted and followed.

PREVIOUS ENFORCEMENT
ACTIONS:

None in the past 5 years.

COMPLIANCE STATUS &
RECOMMENDATIONS:

In regards to the site, the overall status is: In Compliance. The source was surveyed by AVO and with an OGI camera and was found to be well-kept with no visible or fugitive emissions. The DAQ conducted a review of the rules requiring recordkeeping and looked for installation/operation issues onsite. The operator's representatives were pleasant and cooperative. Requested records were provided in a timely manner and reviewed at the local field office.

RECOMMENDATION FOR
NEXT INSPECTION:

The DAQ has no recommendations for the next inspector other than what are customary. The DAQ was joined by FourPoint personnel during the site inspection

UNDER EPA DECREE:

No

ATTACHMENTS:

Applicable Supporting Documentation Included



Chris Jensen <chrisjensen@utah.gov>

1/7/2026 Inspections Results and Corrective Actions

7 messages

Brad Rowser <browser@fourpointresources.com>
 To: Chris Jensen <chrisjensen@utah.gov>
 Cc: Jeanette Liang <jliang@fourpointenergy.com>

Wed, Jan 7, 2026 at 3:07 PM

Good afternoon, Chris,

Was good spending the morning with you today. Here are the results and corrective actions for the inspections performed today.

<u>Location</u>	<u>Inspection Date</u>	<u>Issue(s) Found</u>	<u>Corrective Action</u>	<u>Repair Date</u>
Ute Tribal 9-3-4-1E	1/7/2026	No Issues Found	N/A	N/A
Ute Tribal 5-2-4-1E	1/7/2026	No Issues Found	N/A	N/A
Ute Tribal 3-2-4-1E	1/7/2026	Leak on gas regulator in heater/treater	Tightened threaded fitting on gas regulator	1/7/2026
Ute Tribal 11-2-4-1E	1/7/2026	Oil tank 1 thief hatch leaking	Replaced LL20 thief hatches on oil tanks 1 & 2 with Enardo 665 hatches	1/7/2026
Ute Tribal 7-2-4-1E	1/7/2026	Location P&A'd	Jeanette is working on an update to the State Registration Site	TBD
Ute Tribal 15-2-4-1E	1/7/2026	Oil tank 1 thief hatch leaking 2 phase micro switch leaking	Replaced LL20 thief hatches on all three tanks with Enardo 665 hatches and replaced micro switch on 2 phase	1/7/2026

As noted, Jeanette is working on an update which will include the Ute Tribal 7-2-4-1E. She and I discussed the exhaust orientation on engines and are coming to the same conclusion you mentioned; that any engines installed or modified after January 1, 2016, shall vent exhaust gases vertically with various height requirements based on hp ratings. As these were installed prior to that date, we agree they don't have that requirement.

Let me know if I missed anything on the inspection info or if you have other questions. Otherwise, we will see you next Wednesday.

--

Brad Rowser
 Logistics Foreman

FourPoint Resources, LLC
 10530 South County Rd 33
 Myton, UT 84052
Direct 435.646.4870
Cell 435.503.5360

Browser@fourpointresources.com
fourpointenergy.com

Chris Jensen <chrisjensen@utah.gov>
 To: Brad Rowser <browser@fourpointresources.com>

Thu, Jan 8, 2026 at 4:04 PM

It was great seeing you too. Thanks for the updates

Chris Jensen, CES | Environmental Scientist III
Minor Source Compliance | Utah Division of Air Quality
Vernal, Utah 84078 | phone (435) 828-0141



We have reached non-attainment. Do your choices help to correct that or maintain the status quo?

[Quoted text hidden]

Registration	Registration Date	Registration Status	Registration Action	Response Date
Site 10001	1/15/2026	Active	None	None
Site 10002	1/15/2026	Active	None	None
Site 10003	1/15/2026	Active	None	None
Site 10004	1/15/2026	Active	None	None
Site 10005	1/15/2026	Active	None	None
Site 10006	1/15/2026	Active	None	None
Site 10007	1/15/2026	Active	None	None
Site 10008	1/15/2026	Active	None	None
Site 10009	1/15/2026	Active	None	None
Site 10010	1/15/2026	Active	None	None

image002.png
25K

Jeanette Liang <jliang@fourpointenergy.com>

Thu, Jan 8, 2026 at 5:21 PM

To: Rik Ombach <rombach@utah.gov>, Teri Houskeeper <thouskeeper@utah.gov>

Cc: Fred Goodrich <fgoodrich@utah.gov>, Chris Jensen <chrisjensen@utah.gov>, Brad Rowser <browser@fourpointresources.com>

Rik and Teri,

As Brad indicated in his email below, FourPoint Resources, LLC is requesting revisions to our PBR registrations in the attached spreadsheet:

- Columns A-D: Please revise the site names
- Columns F-H: Please cancel these registrations.

Please let me or Brad know if you have any questions.

Thank you.

Jeanette Liang
Air Quality Manager

[FourPoint Resources, LLC](#)

[FourPoint Energy, LLC](#)

100 Saint Paul St, Ste. 400
Denver, CO 80206

D 720.728.6447

C 303.248.6822

jliang@fourpointenergy.com

fourpointenergy.com

[Quoted text hidden]

PBR Registration Update FPR 2026.01.08.xlsx
20K

Rik Ombach <rombach@utah.gov>

Fri, Jan 9, 2026 at 7:49 AM

To: Jeanette Liang <jliang@fourpointenergy.com>

Cc: Teri Houskeeper <thouskeeper@utah.gov>, Fred Goodrich <fgoodrich@utah.gov>, Chris Jensen <chrisjensen@utah.gov>, Brad Rowser <browser@fourpointresources.com>

Thanks Jeanette and Brad.

Rik

[Quoted text hidden]

--



Rik Ombach

Manager | Oil and Gas Compliance

P: (801) 536-4164

airquality.utah.gov

Emails to and from this email address may be considered public records and thus subject to Utah GRAMA requirements.

Teri Houskeeper <thouskeeper@utah.gov> Tue, Jan 13, 2026 at 10:20 AM
To: Rik Ombach <rombach@utah.gov>
Cc: Jeanette Liang <jliang@fourpointenergy.com>, Fred Goodrich <fgoodrich@utah.gov>, Chris Jensen <chrisjensen@utah.gov>, Brad Rowser <browser@fourpointresources.com>

These have all been updated.

Thanks

Teri Houskeeper
Senior Business Analyst
Division of Air Quality
(385)251-9650
thouskeeper@utah.gov

[Quoted text hidden]

Jeanette Liang <jliang@fourpointenergy.com> Tue, Jan 13, 2026 at 10:34 AM
To: Teri Houskeeper <thouskeeper@utah.gov>, Rik Ombach <rombach@utah.gov>
Cc: Fred Goodrich <fgoodrich@utah.gov>, Chris Jensen <chrisjensen@utah.gov>, Brad Rowser <browser@fourpointresources.com>

Thank you Teri!

Jeanette Liang

D 720.728.6447
C 303.248.6822

[Quoted text hidden]

Chris Jensen <chrisjensen@utah.gov> Tue, Jan 13, 2026 at 4:17 PM
To: Jeanette Liang <jliang@fourpointenergy.com>
Cc: Teri Houskeeper <thouskeeper@utah.gov>, Rik Ombach <rombach@utah.gov>, Fred Goodrich <fgoodrich@utah.gov>, Brad Rowser <browser@fourpointresources.com>

All
I have all the changes made in our mapping utility too now.
Jeanette
Thanks for making this list. Of all those plugged wells..... I only had one of them marked as plugged.

[Quoted text hidden]

--

[Quoted text hidden]