



Department of Environmental Quality



To protect, conserve and enhance the quality of Wyoming's environment for the benefit of current and future generations.

Dave Freudenthal, Governor

John Corra, Director

October 3, 2007

Ms. Jennifer Knowlton
Compliance Engineer
Rowdy Pipeline, LLC
105 South Fourth Street
Artesia, New Mexico 88210

RE: Notice of Violation

Dear Ms. Knowlton:

Enclosed is a Notice of Violation issued to Rowdy Pipeline, LLC for the failure to comply with the engine limitation requirements in permit CT-3568 for the Caterpillar engines at Interstate 1 (Dry Creek) Compressor Station located in Johnson County, Wyoming.

As the Department and this Division consider the failure to comply with air quality permit requirements to be a serious matter, I am considering recommending the Department refer this violation to the State Attorney General's office requesting a suit be filed in District Court to recover appropriate penalties. If you would like to discuss settlement of this Notice of Violation prior to referral to the Attorney General's office, please contact Ms. Karen Godman, Air Quality Compliance Program Principal, at 307-777-8601 no later than ten (10) days after receipt of this letter.

Should you have any questions or comments regarding this matter, please feel free to contact me or Ms. Karen Godman.

Sincerely,

David A. Finley
Administrator
Air Quality Division

cc: Robert Gill
Karen Godman
Mike Warren
Nancy Vehr
Keith Guille



**BEFORE THE
DEPARTMENT OF ENVIRONMENTAL QUALITY
STATE OF WYOMING**

IN THE MATTER OF THE NOTICE OF VIOLATION)	
ISSUED TO ROWDY PIPELINE, LLC,)	DOCKET NO.
MS. JENNIFER KNOWLTON,)	4154-07
COMPLIANCE ENGINEER,)	
105 SOUTH FOURTH STREET)	
ARTESIA, NEW MEXICO 88210)	

NOTICE OF VIOLATION

NOTICE IS HEREBY GIVEN THAT:

1. The Department of Environmental Quality, Division of Air Quality, has found Rowdy Pipeline, LLC to be in violation of permit CT-3568 issued in accordance with W.S. 35-11-801 of the Wyoming Environmental Quality Act and Chapter 6, Section 2 of the Wyoming Air Quality Standards and Regulations for Interstate 1 (Dry Creek) Compressor Station located in Johnson County, Wyoming.

2. W.S. 35-11-801(a) states, "In granting permits, the Director may impose such conditions as may be necessary to accomplish the purpose of this act which are not inconsistent with the existing rules, regulations and standards."

3. Chapter 6, Section 2 of the Wyoming Air Quality Standards and Regulations prescribes the applicability and procedures for issuing permits to sources under Wyoming's construction and modification permitting program.

4. Permit CT-3568 was issued to Rowdy Pipeline, LLC on March 23, 2004. Condition 11 states:

"That the engine configuration for the Interstate 1 Compressor Station shall be limited to eight (8) engines consisting of the following:

E1-E3: Any combination of Caterpillar G3412 engines equipped with an oxidation catalyst, Waukesha H24GL engines equipped with an oxidation catalyst, or Caterpillar G3408TALE engines equipped with an oxidation catalyst.

E4-E7: Caterpillar G3516TALE engines equipped with an oxidation catalyst.

Once constructed, units E1-E3 lose their flexibility and cannot be replaced by a different model engine unless authorized by an appropriate permit modification."

5. On July 11, 2007, Air Quality Engineers, Mr. Brad Steidley and Ms. Debbie White conducted an inspection of Interstate 1 (Dry Creek) Compressor Station operated by Rowdy Pipeline, LLC. During this inspection, the engineers noted a fourth 637 Hp Caterpillar G3412 engine at the Interstate 1 Compressor Station. Under permit CT 3584, a maximum of three Caterpillar G3412 engines can be installed at the facility. The installation of this engine constitutes a violation of condition 11 of permit CT-3568.

6. Said violation consists of installation of a 637 Hp Caterpillar G3412 engine without a permit modification. This constitutes a violation of permit condition 11 within permit CT-3568.

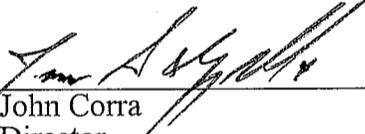
7. Under W.S. 35-11-901(a), any person who violates any provision of Article 2 of [the Environmental Quality Act] ... or any rule, regulation, standard or permit adopted pursuant to those provisions, or who violates any determination or order of the council pursuant to Article 2 of [the Environmental Quality Act] ... is subject to a penalty not to exceed ten thousand dollars (\$10,000.00) for each violation for each day during which the violation continues, a temporary or permanent injunction, or both a penalty and an injunction.

8. This notice is being sent to you pursuant to W.S. 35-11-701(c), which requires that, in any case of the failure to correct or remedy an alleged violation, the Director of the Department of Environmental Quality shall cause a written notice to be issued and served upon the person alleged to be responsible.

DATED this 4th day of October, 2007.



David A. Finley
Administrator
Air Quality Division



John Corra
Director
Department of Environmental Quality

Please direct all inquiries to David A. Finley, Administrator, Division of Air Quality, Department of Environmental Quality, Herschler Building, 2nd Floor, 122 W. 25th Street, Cheyenne, Wyoming 82002. (Telephone: 307/777-7393.)