



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

April 23, 2008

Mr. H. James Sewell
Staff Environmental Engineer
Shell Rocky Mountain Production, LLC
4582 S. Ulster Street Parkway, Suite 500
Denver, CO 80237

RE: Notice of Violation

Dear Mr. Sewell:

Enclosed you will find a Notice of Violation (NOV) issued to Shell Rocky Mountain Production, LLC by the Department of Environmental Quality, Air Quality Division, for failing to comply with the permit requirement for routing vapors from the condensate tanks to the combustor for the Riverside 13B PAD located in Sublette County, Wyoming. This violation of permit CT-4262 was observed by Ms. Jennifer Frazier on February 20, 2008.

As the Department and this Division consider the failure to comply with air quality permit conditions 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
Jennifer Frazier
Tony Hoyt
Nancy Vehr
Keith Guille

Herschler Building • 122 West 25th Street • Cheyenne, WY 82002 • <http://deq.state.wy.us>

ADMIN/OUTREACH (307) 777-7937 FAX 777-3610	ABANDONED MINES (307) 777-6145 FAX 777-6462	AIR QUALITY (307) 777-7391 FAX 777-5616	INDUSTRIAL SITING (307) 777-7369 FAX 777-5973	LAND QUALITY (307) 777-7756 FAX 777-5864	SOLID & HAZ. WASTE (307) 777-7752 FAX 777-5973	WATER QUALITY (307) 777-7781 FAX 777-5973
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**BEFORE THE
DEPARTMENT OF ENVIRONMENTAL QUALITY
STATE OF WYOMING**

**IN THE MATTER OF THE NOTICE OF VIOLATION
ISSUED TO SHELL ROCKY MOUNTAIN PRODUCTION, LLC,
MR. H. JAMES SEWELL,
STAFF ENVIRONMENTAL ENGINEER,
4582 SOUTH ULSTER STREET PARKWAY, SUITE 500
DENVER, COLORADO 80237**

**DOCKET NO.
4257-08**

NOTICE OF VIOLATION

NOTICE IS HEREBY GIVEN THAT:

1. The Department of Environmental Quality, Division of Air Quality, has found Shell Rocky Mountain Production, LLC to be in violation of permit CT-4262 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 at the Riverside 13B PAD located in Sublette 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-4262 was issued to Shell Rocky Mountain Production, LLC on April 26, 2006. Condition 11(A.) & 12 require vapors not be vented to open atmosphere. Condition 11(A.) states:

"Upon the First Date of Production of an additional well at the Riverside 13B PAD facility or upon the date of production associated with a well from a separate location is tied into the Riverside 13B PAD, controls for emissions from all existing and new hydrocarbon liquid storage tanks and pressure vessels (flashing, standing/working/breathing losses and any separator flash gas not collected for sales) shall be installed and operational. Emission control systems or devices installed under this condition shall be designed and operated to reduce the mass content of VOCs in the gases vented by at least ninety-eight percent (98%) by weight, and shall meet the requirements of the Chapter 6, Section 2 Oil and Gas Production Facilities Permitting Guidance."

Condition 12 follows this with:

"Emission control devices installed under condition eleven (11) shall be maintained and operated during all periods of active well site operation such that each remains effective as viable emissions control devices. Records shall be maintained noting dates and durations of times during active well site operation when any emission control device is not operational."

5. On February 20, 2008, Ms. Jennifer Frazier, Air Quality Division Engineer/Inspector, observed both Enardo valves continuously venting vapors to the atmosphere. Venting vapors from Enardo valves during well production are a failure of control devices and a violation of condition 12 of permit CT-4262.

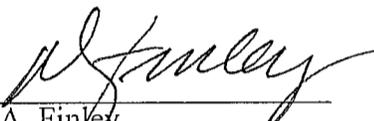
Shell Rocky Mountain Production, LLC
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6. Said violation consists of venting vapors from the Enardo valves to the atmosphere. Venting vapors from Enardo valves during well production are a failure of control devices and a violation of condition 12 of permit CT-4262.

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 25th day of April, 2008.



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.)