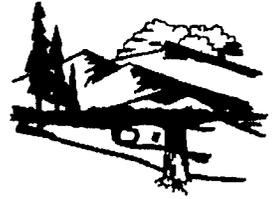




Department of Environmental Quality



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 2, 2008

Ms. Cortine Morrell
Environmental Specialist
Williams Field Services
4980 Sate Highway 374
Green River, WY 82935

RE: Notice of Violation

Dear Ms. Morrell:

Enclosed is a Notice of Violation issued to Williams Field Services Company for the failure to operate the of the 2.0 MMSCFD dehydrator at the Whiskey Buttes # 8 CDM located in Lincoln County as represented in the permit application for waiver AP-T47.

As the Department and this Division consider the failure to comply with air quality permit/waiver 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: Bob Gill
Tony Hoyt
Nancy Vehr
Keith Guille



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

**IN THE MATTER OF THE NOTICE OF VIOLATION ISSUED
TO WILLIAMS FIELD SERVICES COMPANY,
MS. CORTINE MORRELL, ENVIRONMENTAL SPECIALIST
4980 STATE HIGHWAY 374,
GREEN RIVER, WY 82935**

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) **DOCKET NO. 4380-08**
)
)
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NOTICE OF VIOLATION

NOTICE IS HEREBY GIVEN THAT:

1. The Department of Environmental Quality, Division of Air Quality, has found Williams Field Services Company to be in violation of permit waiver AP-T47 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 in the operation of the 2.0 MMSCFD dehydrator at the Whiskey Buttes # 8 CDM located in Lincoln County, Wyoming.

2. W.S. 35-11-801(c) states, "A permit to construct is required before the construction or modification of any industrial facility capable of causing or increasing air or water pollution in excess of standards established by the department is commenced."

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. Chapter 6, Section 2(a)(i) of the Wyoming Air Quality Standards and Regulations states, "Any person who plans to construct any new facility or source, modify any existing facility or source, or to engage in the use of which may cause the issuance of or an increase in the issuance of air contaminants into the air of this state shall obtain a construction permit from the State of Wyoming, Department of Environmental Quality, before any actual work is begun on the facility."

5. Air quality waiver AP-T47 was issued for the 584 dehydration units on or about February 5, 1999. This waiver was issued based on the emission rates represented in the permit application. One of the listed dehydration units was for the Whiskey Buttes 8 CDM production facility, which is located within the Moxa Gathering District in Sweetwater County, Wyoming. Emissions from gas venting from the dehydrator was not represented in the permit application.

6. On July 9, 2008 an inspection of Whiskey Buttes # 8 CDM was performed by Mr. Jared Beck, Air Quality Engineer/Inspector. During the inspection, Mr. Beck observed venting from the dehydration unit. In response to this inspection, Williams Field Services submitted the letter WDEQ/EPA Inspection of Whiskey Buttes #8 Well Site Dehydrator, July 18, 2008. This letter explains that the gas venting episode was caused by a build-up of pressure in the Moxa gathering system. The resulting pressure build up in the gathering system, along with the gas continuing to flow to the unit, caused the pressure relief valve on the Whiskey Buttes # 8 CDM dehydration contactor tower to vent to the atmosphere. Williams Field Services stated that based on their data, there is potential that this venting could have occurred for approximately 21 hours. Gas vented from the dehydrator are in excess of those represented in the permit application for waiver AP-T47.

7. Said violation consists of the failure to operate the 2.0 MMSCFD dehydrator at the Whiskey Buttes # 8 CDM wellsite as represented in the permit application for waiver AP-T47 resulting in an increase in emissions from the facility in violation of W.S. 35-11-801(c) of the Wyoming Environmental Quality Act and Chapter 6, Section 2(a)(i) of the Wyoming Air Quality Standards and Regulations.

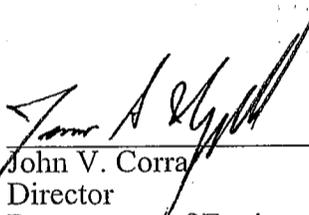
8. Under W.S. 35-11-901(a), any person who violates any provision of Article 2 of [the Environmental Quality Act] ... or any rule, regulation, standard or permit adopted pursuant to those provisions, or who violates any determination or order of the council pursuant to Article 2 of [the Environmental 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.

9. 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 17th day of OCTOBER, 2008.



David A. Finley
Administrator
Air Quality Division



John V. 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.)