



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

August 6, 2009

Mr. Terry Herauf
General Manager
Copano Pipelines/Rocky Mountains, LLC
5762 E. U.S. HWY 14-16
Arvada, WY 82831

RE: Notice of Violation

Dear Mr. Herauf:

Enclosed you will find a Notice of Violation (NOV) issued to Copano Pipelines/Rocky Mountains, LLC by the Department of Environmental Quality, Air Quality Division, for the failure to install a thermocouple to measure the inlet catalyst temperatures as required by permits MD-1088 Extension, CT-4092A, MD-7445, CT-4090, MD-6029, MD-1102, MD-1146 Extension. These violations were observed during inspections conducted on June 8 & 9, 2009 at the following facilities:

- a. Collums Compressor Station, Campbell County, Wyoming
- b. Dow #2 Compressor Station, Sheridan County, Wyoming
- c. Sales 14 Compressor Station, Sheridan County, Wyoming
- d. Sampson Ranch 33 Compressor Station, Sheridan County, Wyoming
- e. L.S. Draw Compressor Station, Campbell County, Wyoming
- f. Wild Horse Compressor Station, Sheridan County, Wyoming

As the Department and this Division consider the failure to comply with air quality permitting 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 J. 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
Tanner Shatto
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 COPANO PIPELINES/ROCKY MOUNTAINS, LLC,
MR. TERRY HERAUF, GENERAL MANAGER
5762 E. U.S. HWY 14-16,
ARVADA, WYOMING 82831**

DOCKET NO. 4547-09

NOTICE OF VIOLATION

NOTICE IS HEREBY GIVEN THAT:

1. The Department of Environmental Quality, Division of Air Quality, has found Copano Pipelines/Rocky Mountains, LLC to be in violation of permits MD-1088 Extension, CT-4092A, MD-7445, CT-4090, MD-6029, MD-1102, MD-1146 Extension 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 Collums Compressor Station, Dow #2 Compressor Station, Sales 14 Compressor Station, Sampson Ranch 33 Compressor Station, L.S. Draw Compressor Station, and Wild Horse Compressor Station located in Campbell County and Sheridan 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. Permits MD-1088 Extension, CT-4092A, MD-7445, CT-4090, MD-6029, MD-1102, MD-1146 Extension were issued to Cantera Natural Gas, LLC which was then acquired by Copano Pipelines/Rocky Mountains, LLC on May 11, 2009. Within all of these permits is a condition that states:

"Install a thermocouple to measure the inlet catalyst temperature."

5. On June 8 & 9, 2009, Ms. Debbie White conducted inspections and record reviews of the compressor stations listed above. During these inspections, it was noted that thermocouples had not been installed at any of these facilities to measure the inlet catalyst temperatures.

6. Said violations consist of failing to install a thermocouple to measure the inlet catalyst temperatures as required by permit at the following facilities:

- a. Collums Compressor Station, Campbell County, Wyoming
- b. Dow #2 Compressor Station, Sheridan County, Wyoming
- c. Sales 14 Compressor Station, Sheridan County, Wyoming
- d. Sampson Ranch 33 Compressor Station, Sheridan County, Wyoming
- e. L.S. Draw Compressor Station, Campbell County, Wyoming
- f. Wild Horse Compressor Station, Sheridan County, Wyoming

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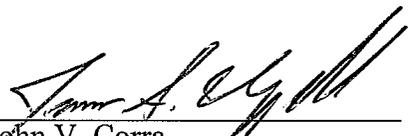
7. Under W.S. 35-11-901(a), any person who violates any provision of Article 2 of [the Environmental Quality Act] ... or any rule, regulation, standard or permit adopted pursuant to those provisions, or who violates any determination or order of the council pursuant to Article 2 of [the Environmental 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 20th day of August, 2009.



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.)