



# 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 5, 2009

Ms. Lisa Norton  
Environmental Division  
Rowdy Pipeline, LLC  
105 South Fourth Street  
Artesia, NM 88210

RE: Notice of Violation

Dear Ms. Norton:

Enclosed you will find a Notice of Violation (NOV) issued to Rowdy Pipeline, LLC by the Department of Environmental Quality, Air Quality Division, for the failure to record the pressure drop across the catalysts as required by permits CT-3731A and MD-1135. These violations were observed during inspections conducted on June 10, 2009 at the 20 Mile Creek Compressor Station and Hanslip Central Compressor Station located in Campbell 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 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



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

**IN THE MATTER OF THE NOTICE OF VIOLATION )  
ISSUED TO ROWDY PIPELINE, LLC )  
MS. LISA NORTON, )  
ENVIRONMENTAL DIVISION DIRECTOR, )  
105 SOUTH FOURTH STREET )  
ARTESIA, NM 88210 )**

**DOCKET NO. 4575-09**

**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 permits CT-3731A and MD-1135 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 the 20 Mile Creek Compressor Station and Hanslip Central Compressor Station located in Campbell 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-3731A was issued to Rowdy Pipeline, LLC on October 27, 2005. Permit MD-1135 was issued to Rowdy Pipeline, LLC on March 25, 2005. Within both of these permits is a condition that states:

"Install a device to measure the pressure drop across the catalyst. The pressure drop across the catalyst shall be recorded at least monthly..."

5. On June 10, 2009, Ms. Debbie White conducted inspections and record reviews of the compressor stations listed above. During these inspections, it was noted that the pressure drop measurement had not been recorded for one engine at 20 Mile Creek Compressor Station and two engines at Hanslip Central Compressor Station.

6. Said violations consist of failing to record the pressure drop across the catalyst at the following facilities for the following engines:

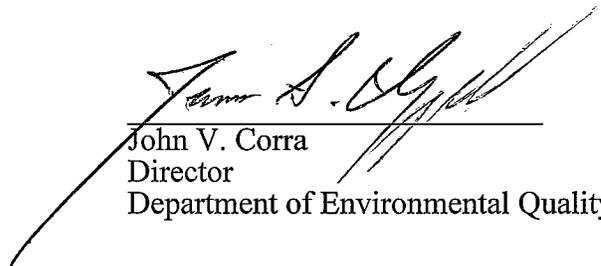
- a. 20 Mile Creek Compressor Station, Campbell County, Wyoming  
E1 Waukesha H24GL (s/n C-13004/2)
- b. Hanslip Central Compressor Station, Campbell County, Wyoming  
E2 Caterpillar G3516TALE (s/n 4EK-03860) & E3 Caterpillar G3516TALE (s/n 4EK-03925)

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 8<sup>th</sup> day of October, 2009.

  
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David A. Finley  
Administrator  
Air Quality Division

  
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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.)