



# 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

January 3, 2010

Mr. Korby Bracken  
Staff Environmental Analyst  
Anadarko E & P Company, LP  
1099 18<sup>th</sup> Street, Suite 1800,  
Denver, CO 80202

Re: Notice of Violation

Dear Mr. Bracken:

Enclosed you will find a Notice of Violation (NOV) issued to Anadarko E & P Company, LP 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 Wamsutter 21-13D, 41-13, 43-13D PAD located in Sweetwater County, Wyoming. This violation of permit CT-8780 was observed by Mr. Greg Johnston on November 3, 2010.

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,

Steven A. Dietrich  
Administrator  
Air Quality Division

cc: Robert Gill  
Tony Hoyt  
Nancy Vehr  
Keith Guille



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

<b>IN THE MATTER OF THE NOTICE OF VIOLATION</b>	)	
<b>ISSUED TO ANADARKO E&amp;P COMPANY, LP</b>	)	<b>DOCKET NO. 4784-10</b>
<b>MR. KORBY BRACKEN,</b>	)	
<b>STAFF ENVIRONMENTAL ANALYST,</b>	)	
<b>1099 18<sup>TH</sup> STREET, SUITE 1800</b>	)	
<b>DENVER, COLORADO 80202</b>	)	

**NOTICE OF VIOLATION**

**NOTICE IS HEREBY GIVEN THAT:**

1. The Department of Environmental Quality, Division of Air Quality, has found Anadarko E & P Company, LP (Anadarko) to be to be in violation of permit CT-8780 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 Wamsutter 21-13D, 41-13, 43-13D PAD located in Sweetwater 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-8780 was issued to Anadarko E & P Company, LP on March 31, 2009. Condition 6 of permit CT-8780 states:

"Vapors from the condensate tanks, including tank flash and S/W/B vapors, shall be routed to a combustion device to reduce the mass content of VOCs and HAPs in the vapors routed to the device by at least ninety-eight percent (98%) by weight for at least one (1) year following the date of installation of the control device, after which time the control may be removed provided it can be demonstrated that the previous thirty (30) day, uncontrolled, annualized VOC emission rate is less than fifteen (15) tons per year..."

5. On November 3, 2010, Mr. Greg Johnston, Air Quality Division Engineer/Inspector, observed venting vapors from each Enardo valve on the two condensate tanks venting vapors to the atmosphere.

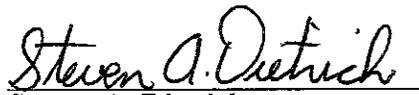
6. Said violation consists of not routing vapors from the condensate tanks to the combustion device. This is a direct violation of Condition 6 of permit CT-8780.

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.

Anadarko E & P Company, LP  
Notice of Violation  
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DATED this 3 day of JAN, 2011  
2010.

  
Steven A. Dietrich  
Administrator  
Air Quality Division

  
John Corra  
Director  
Department of Environmental Quality

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