



Department of Environmental Quality

To protect, conserve and enhance the quality of Wyoming's environment for the benefit of current and future generations.



Matthew H. Mead, Governor

John Corra, Director

August 20, 2012

Mr. Korby Bracken
Staff Environmental Analyst
Anadarko E & P Company, LP
1099 18th 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 LP Standard Draw 24, 43, 44-19D PAD located in Carbon County, Wyoming. This violation of permit CT-8009 was observed by Mr. Jared Beck on June 21, 2012.

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**

**IN THE MATTER OF THE NOTICE OF VIOLATION)
ISSUED TO ANADARKO E&P COMPANY, LP) DOCKET NO. 5036-12
MR. KORBY BRACKEN,)
STAFF ENVIRONMENTAL ANALYST,)
1099 18TH STREET, SUITE 1800)
DENVER, COLORADO 80202)**

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 in violation of permit CT-8009 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 LP Standard Draw 24, 43, 44-19D PAD located in Carbon 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-8009 was issued to Anadarko on September 5, 2008. Permit CT-8009 dictates control of vent vapors from the condensate tanks through conditions 6 as follows:

Condition 6 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 total VOCs and HAPs in the vapors routed to the device by at least ninety-eight percent (98%) by weight..."

5. On June 21, 2012, Mr. Jared Beck, Air Quality Division Engineer/Inspector, observed venting vapors from a thief hatch at the LP Standard Draw 24, 43, 44-19D PAD. This is a violation of condition 6 of permit CT-8009.

6. Said violation consists of the failure to route vapors from condensate tanks to the combustion device at the LP Standard Draw 24, 43, 44-19D located in Carbon County, Wyoming.

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.

Anadarko E & P Company, L.P.
Notice of Violation
Page 2

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, 2012.



Steven A. Dietrich
Administrator
Air Quality Division



John V. 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.)