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

Todd Parfitt, Director

November 8, 2012

Mr. Craig Brown
General Manager EHS
Wexpro Company
1050 17th Street, Suite 500
Denver, CO 80265

RE: Notice of Violation

Dear Mr. Brown:

Enclosed you will find a Notice of Violation (NOV) issued to Wexpro Company by the Department of Environmental Quality, Air Quality Division, for failing to comply with the permit requirement for routing vapors to the emission control device for the Stewart Point 14-20 production site located in Sublette County, Wyoming. This violation of permit MD-10178 was observed by Ms. Brandi O'Brien on May 31, 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 307-777-3774 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

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 WEXPRO COMPANY,	)	**DOCKET NO. 5083 -12**
MR. CRAIG BROWN,	)	
GENERAL MANAGER EHS	)	
1050 17TH STREET, SUITE 500	)	
DENVER, CO 80265	)	

NOTICE OF VIOLATION

NOTICE IS HEREBY GIVEN THAT:

1. The Department of Environmental Quality, Division of Air Quality, has found Wexpro Company to be in violation of permit MD-10178 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 Stewart Point 14-20 production site located in Sublette 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 MD-10178 was issued to Wexpro Company on July 12, 2010. Permit MD-10178 dictates control of vent vapors through conditions 12 & 13 as follows:

Condition 12 states:

> "For the TEG dehydration unit with condenser, reboiler still vent vapors shall be routed to the condenser. Condensed reboiler still vent liquids shall be collected and routed to a liquids storage tank. The non-condensable reboiler still vent vapors shall be routed to the combustion device. The condenser and combustion device shall reduce the mass content of total HAP and VOC emissions in the reboiler still vent by at least ninety-eight percent (98%) by weight."

Condition 13 states:

> "The motive gas discharge line on each pneumatic heat trace pump shall be routed into a fuel gas supply line or any gas or liquid collection line which is ultimately routed into a closed system or emission control system or each pump shall be replaced with an electric, solar or air-operated pump or other device in order to reduce VOC emissions associated with the pump discharge gas stream by at least ninety-eight percent (98%) by weight."

5. On May 31, 2012, Ms. Brandi O'Brien, Air Quality Division Engineer/Inspector, observed venting vapors from the valve at the bottom of the combustion device. Venting vapors and not routing vapors to the emission control device are violations of conditions 12 & 13 of permit MD-10178.

6. Said violation consists of venting vapors and not routing vapors to the emission control device. These are violations of conditions 12 & 13 of permit MD-10178.

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 8th day of NOVEMBER, 2012.

Steven A. Dietrich
Administrator
Air Quality Division

Todd Parfitt
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.)