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

May 14, 2013

Mr. David Richardson
Richardson Companies
4725 S. Monaco St, Suite 200
Denver, Colorado 80237

RE: Notice of Violation

Dear Mr. Richardson:

Enclosed you will find a Notice of Violation (NOV) issued to Richardson Companies by the Department of Environmental Quality, Air Quality Division, for the presence of an unpermitted engine and failure to operate the combustion unit at the Fuller Compressor Station located in Fremont County, Wyoming. This constitutes a violation of conditions 9 and 15 of permit CT-4405A.

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

Steven A. Dietrich
Administrator
Air Quality Division

cc: Robert Gill
Greg Meeker
Nancy Vehr
Keith Guille

BEFORE THE
DEPARTMENT OF ENVIRONMENTAL QUALITY
STATE OF WYOMING

IN THE MATTER OF THE NOTICE OF VIOLATION	)	
ISSUED TO RICHARDSON COMPANIES	)	**DOCKET NO. 5161-13**
MR. DAVID RICHARDSON	)	
4725 S. MONACO ST, SUITE 200	)	
DENVER, COLORADO 80237	)	

NOTICE OF VIOLATION

NOTICE IS HEREBY GIVEN THAT:

1. The Department of Environmental Quality, Division of Air Quality, has found Richardson Companies to be in violation of permit CT-4405A 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 Fuller Compressor Station located in Fremont 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-4405A was issued to EnCana Oil & Gas (USA), Inc. on July 8, 2008 for the Fuller Compressor Station. This facility and applicable permits transferred to Richardson Companies on or about August 31, 2009. Conditions 9 and 15 limit the engine configuration at the facility and require control of vapors through combustion devices as follows:

Condition 9:

> "That the engine configuration for the Fuller Compression Station shall be limited to one (1) Caterpillar G3512LE engine equipped with an oxidation catalyst and an AFRC"

Condition 15:

> "...shall maintain and operate the combustion device during all periods of active operation of the dehydration units such that the controls remain effective as a viable emissions control device."

5. On April 15, 2013, Mr. Greg Meeker, Air Quality Division Engineer/Inspector, noted an unpermitted Waukesha H24GL engine without controls operating at the facility. On that date Mr. Meeker also noted that the dehydration unit was operating without controls. The presence of an unpermitted engine and the failure to operate the combustion unit are violations of conditions 9 and 15 of permit CT-4405A.

6. Said violations consists of the presence of an unpermitted engine and the failure to operate the combustion unit at the Fuller Compressor Station, which are violations of conditions 9 and 15 of permit CT-4405A.

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 14th day of MAY, 2013.

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.)