



# 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 26, 2014

Mr. Daniel Pring  
Senior Environmental Air Engineer  
QEP Field Services Company  
1050 17th Street, Suite 500  
Denver, CO 80265

RE: Notice of Violation

Dear Mr. Pring:

Enclosed you will find a Notice of Violation (NOV) issued to QEP Field Services Company by the Department of Environmental Quality, Air Quality Division, for failing to comply with permit requirements for visible emissions and maintaining the combustor at the Trail Unit 12 production facility located in Sweetwater County, Wyoming. These violations of permit MD-12588 were observed by Mr. Travis Guthrie on October 8, 2014.

As the Department and this Division consider the failure to comply with applicable 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. Ann Shed, 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. Ann Shed.

Sincerely,

Steven A. Dietrich  
Administrator  
Air Quality Division

cc: Fred Dilella  
Ann Shed  
Tony Hoyt  
Elizabeth Lyon  
Landon Brown



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

**IN THE MATTER OF THE NOTICE OF VIOLATION )  
ISSUED TO QEP FIELD SERVICES COMPANY ) DOCKET NO. 5509-14  
MR. DANIEL PRING )  
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 QEP Field Services Company to be in violation of permit MD-12588. This permit was 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 (WAQSR) for the Trail Unit 12 production facility 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 WAQSR prescribes the applicability and procedures for issuing permits to sources under Wyoming's construction and modification permitting program.

4. Permit MD-12588 was issued to QEP Field Services Company on April 17, 2012 for the Trail Unit 12 production facility. Condition 18 requires control of visible emissions as follows:

"The combustion device shall be designed, constructed, operated and maintained to be smokeless, per Chapter 3, Section 6(b)(i) of the WAQSR, with no visible emissions except for periods not to exceed a total of five (5) minutes during any two (2) consecutive hours as determined by 40 CFR part 60, appendix A, Method 22."

5. On October 8, 2014, Mr. Travis Guthrie, Air Quality Division Engineer/Inspector, observed smoke venting from the combustor during the duration of his presence at the facility (approximately 20 minutes). The presence of the visible emissions and failure to maintain the combustor unit are violations of condition 18 of permit MD-12588.

6. Said violations consist of the presence of the visible emissions and failure to maintain the combustor unit at the Trail Unit 12 production facility, which are violations of permit MD-12588.

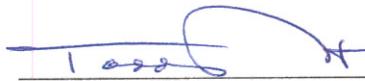
7. Under W.S. 35-11-901(a), any person who violates any provision of Article 2 of [the Environmental Quality Act] ... or any rule, regulation, standard or permit adopted pursuant to those provisions, or who violates any determination or order of the council pursuant to Article 2 of [the Environmental 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 26<sup>th</sup> day of NOVEMBER, 2014.



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)