



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

December 5, 2014

Ms. Jeanette Liang
Environmental Professional
Whiting Oil & Gas Corporation
1700 Broadway, Suite 2300
Denver, CO 80290-2300

RE: Notice of Violation

Dear Ms. Liang:

Enclosed you will find a Notice of Violation (NOV) issued to Whiting Oil & Gas Corporation by the Department of Environmental Quality, Air Quality Division, for failing to comply with permit requirements for routing vapors to the emission control device and venting vapors at the Luckey Ditch Unit I-11 facility located in Uinta County, Wyoming. These violations of permit CT-13845 were observed by Mr. Jared Beck on August 20, 2014.

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. 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 WHITING OIL AND GAS CORPORATION) DOCKET NO. 5510-14
MS. JEANETTE LIANG)
1700 BROADWAY, SUITE 2300)
DENVER, CO 80290-2300)**

NOTICE OF VIOLATION

NOTICE IS HEREBY GIVEN THAT:

1. The Department of Environmental Quality, Division of Air Quality, has found Whiting Oil and Gas Corporation to be in violation of permit CT-13845 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 Luckey Ditch Unit I-11 facility located in Uinta 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 CT-13845 was issued to Whiting Oil and Gas Corporation on January 7, 2013 for the Luckey Ditch Unit I-11 facility. Condition 17 requires control of emissions as follows:

"Emission control equipment, including the VOC and HAP emission control system or device, all vent lines, connections, fittings, valves, relief valves, hatches or any other appurtenance employed to contain and collect vapors and transport them to the emission control system or device, shall be maintained and operated during any time the wells are producing such that the emissions are controlled at all times..."

5. On August 20, 2014, Mr. Jared Beck, Air Quality Division Engineer/Inspector, observed that vapors were venting from an Enardo valve.

6. Said violations consist of venting vapors and not routing vapors to the emission control device at the Luckey Ditch Unit I-11 facility. These are violations of condition 17 of permit CT-13845.

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 5th day of DECEMBER, 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.)