



Department of Environmental Quality



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

Dave Freudenthal, Governor

John Corra, Director

CERTIFIED MAIL

April 23, 2007

Gretchen Kohler
Williams Production RMT Company
300 North Works Avenue
Gillette, WY 82716

RE: Notice of Violation, Docket Number 4052-07

Dear Ms. Kohler:

Attached is a copy of a Notice of Violation, Docket Number 4052-07, issued to Williams Production RMT Company (Williams) for recurring violations of WYPDES permit requirements. Williams has received Letters of Violation (LOVs) regarding permit violations and has also submitted, as required under WYPDES permit requirements, exceedance notifications to the Wyoming Department of Environmental Quality Water Quality Division in lieu of LOVs.

While neither the attached Notice of Violation nor this letter, constitute an order, this office strongly urges you to take action to immediately eliminate the alleged violations as follows:

1. Williams should maintain compliance with all conditions established in their WYPDES permits.
2. Williams should provide the WQD with an inventory of identified violations, actions to be taken to achieve compliance with permit requirements, and a compliance schedule for completion of each identified action. The report should be presented to the Wyoming Department of Environmental Quality (DEQ), Water Quality Division (WQD) during discussion to settle this Notice of Violation.

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Herschler Building • 122 West 25th Street • Cheyenne, WY 82002 • <http://deq.state.wy.us>

ADMIN/OUTREACH	ABANDONED MINES	AIR QUALITY	INDUSTRIAL SITING	LAND QUALITY	SOLID & HAZ. WASTE	WATER QUALITY
(307) 777-7937	(307) 777-6145	(307) 777-7391	(307) 777-7369	(307) 777-7756	(307) 777-7752	(307) 777-7781
FAX 777-3610	FAX 777-6462	FAX 777-5616	FAX 777-5973	FAX 777-5864	FAX 777-5973	FAX 777-5973

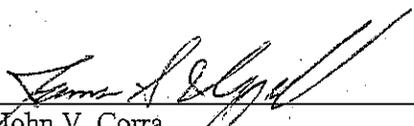


Williams Production RMT Company

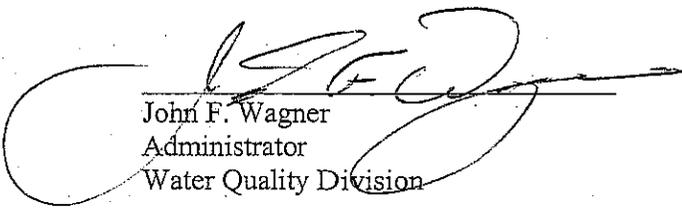
April 23, 2007

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The WQD has the authority to resolve violations with an out-of-court settlement agreement through the payment of a stipulated penalty and agreement to an enforceable compliance schedule by Williams. If Williams wishes to pursue resolution of the previously noted violations through such an agreement, please contact Mr. Kevin M. Wells, WYPDES Compliance & Enforcement Coordinator at (307) 777-8669, or Mr. Brian K. Lovett, WYPDES Inspection & Compliance Supervisor at (307) 777-5630 on or before May 10, 2007 to set up a meeting to discuss this matter.



John V. Corra
Director
Department of Environmental Quality



John F. Wagner
Administrator
Water Quality Division

JVC/JFW/KMW/bb/7-0330.LTR

Enclosure: Notice of Violation

cc: Aaron Urdiales, 8ENF-W-NP, EPA Region 8 (PDF)
Jim Eisenhauer, Sheridan DEQ Office (PDF)
Bill J. DiRienzo ► Brian K. Lovett ► Leah J. Krafft
IPS (for scanning) ► Docket 4052-07
Keith Guille, DEQ Public Information Officer (PDF file only)
DEQ Director

BEFORE THE

DEPARTMENT OF ENVIRONMENTAL QUALITY

STATE OF WYOMING

**IN THE MATTER OF THE NOTICE OF
VIOLATION ISSUED TO:**

**Williams Production RMT Company
300 North Work Avenue
Gillette, WY 82716**

DOCKET NUMBER 4052-07

NOTICE OF VIOLATION

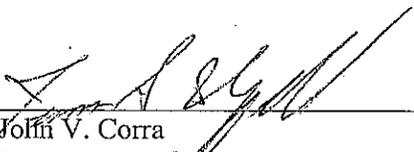
NOTICE IS HEREBY GIVEN THAT:

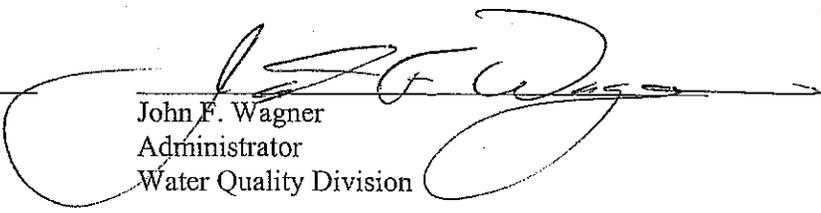
1. Williams Production RMT Company (Williams) operates numerous coal bed methane gas production facilities in Wyoming. Williams holds numerous Wyoming Pollution Discharge Elimination System (WYPDES) permits in Wyoming. The WYPDES permits were issued by the Wyoming Department of Environmental Quality (DEQ), Water Quality Division (WQD)
2. As of April 1, 2007 Williams has had numerous recurring violations of its WYPDES permits. Letters of violation (LOVs) have been issued to Williams by the WQD on many occasions. In other instances exceedance notifications, or discharge monitoring reports (DMRs) have identified additional violations.
3. Williams has had 13 violations as a result of WQD inspections from January 2006 through March 2007.
4. Williams has submitted 153 exceedance notifications from January 2006 through March 2007.
5. Williams has had 107 permit limit exceedances reported on DMRs from January 2006 through March 2007.
6. Williams has 16 WYPDES permits that have had 4 or more recurring violations. These violations occurred under the following permits: WY0038075, WY0039462, WY0039471, WY0040096, WY0040118, WY0041866, WY0041874, WY0042242, WY0042340, WY0042358, WY0046337, WY0049999, WY0050369, WY0051241, WY0051268, and WY0051918.
7. Williams has 7 WYPDES permits that have had 3 recurring violations. These violations occurred under the following permits: WY0042340, WY0048585, WY0048747, WY0049999, WY0051268, WY0051713, and WY0054411.
8. Williams has 16 WYPDES permits that have had 2 recurring violations. These violations occurred under the following permits: WY0036641, WY0037486, WY0037494, WY0037524, WY0037591, WY0038075, WY0040100, WY0041581, WY0041874, WY0042854, WY0048933, WY0050369, WY0050857, WY0051161, and WY0051241.
9. Williams has 10 WYPDES permits that have been issued LOVs for lack of proper facility identification at the outfall, and has 11 WYPDES permits that have been issued LOVs for lack of free fall at the outfall.

10. This Notice is being sent to you pursuant to W.S. 35-11-701(c)(i), 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 on the person alleged to be responsible;
11. Pursuant to Wyoming Statute 35-11-901(a), any person who violates, or any director, officer, or agent of a corporate permittee who willingly and knowingly authorizes, orders, or carries out the violation of any provision of the Environmental Quality Act (Act), or any rule, regulation, standard, or permit adopted hereunder or who violates any determination or order of the council pursuant to this act or any rule, regulation, standard, permit, license, or variance is subject to a penalty not to exceed ten thousand dollars and no cents (\$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. The penalty may be recovered in a civil action brought by the Attorney General in the name of the People of the State of Wyoming. Nothing herein shall preclude the DEQ from negotiating stipulated settlements involving the payment of a penalty, implementation of compliance schedules or other settlement conditions.

NOTHING IN THIS NOTICE OF VIOLATION (NOV) shall be interpreted to in any way limit or contravene any other remedy available under the Environmental Quality Act, nor shall this NOV be interpreted as being a condition precedent to any other enforcement action.

Signed this 27th day of April, 2007.


Jolfin V. Corra
Director
Department of Environmental Quality


John F. Wagner
Administrator
Water Quality Division

PLEASE DIRECT ALL INQUIRIES TO: Kevin M. Wells., WYPDES Compliance & Enforcement Coordinator, Wyoming Department of Environmental Quality, Water Quality Division, Herschler Building, 4th Floor West, 122 West 25th Street, Cheyenne, Wyoming 82002. Telephone 307-777-8669.

JVC/JFW/KMW/MB/bb/7-0330.NOV

cc: Aaron Urdiales, 8ENF-W-NP, EPA Region 8 (PDF)
Jim Eisenhauer, Sheridan DEQ Office (PDF)
Bill J. DiRienzo ► Brian K. Lovett ► Leah J. Krafft
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DEQ Director