

Tuscola Energy, Inc.

920 North Water Street, Suite 213
Bay City, Michigan 48708

12/31/18

Mr. Matt Karl
Air Quality Division
Saginaw Bay District Office
401 Ketchum Street, Suite B
Bay City, MI 48708

Re: Response to December 19, 2018 Violation Notice: SRN N7955; ACO 37-2015

Dear Mr. Karl

Below I have provided our responses to the Violation Notice.

Response to SRN N7955

Allegation	Response
PTI 97-09A FGOILPRODUCTION SC II.1 (R 336.1225) – The mass flow rate of hydrogen sulfide going to the flare shall not exceed 232 pounds per day.	We exceeded our flow rate on August 24, 27, and 28 in 2018. These were the only 3 days for the year that we exceeded our limit and haven't exceeded the limit in the past four months. Usually when we go over it is because the well has been down for a period of time and the gas pressure has increased enough so when we do flow the well we could possibly go over. We watch our flow rates much closer on days after we restart a well that has been down for a while, and will adjust pumping times to try to stay under the limit until the flow rate will stay under the daily limit.

Please contact me if you have any questions.

Respectfully submitted,

Tuscola Energy, Inc.

By:



Jeffrey M. Adler - President