



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SAGINAW BAY DISTRICT OFFICE



C. HEIDI GREYER  
DIRECTOR

November 5, 2018

Mr. Jeff Adler, President  
Tuscola Energy, Inc  
7998 M-25  
Akron, Michigan 48701-9773

SRN: N1586, Tuscola County

Dear Mr. Adler:

**VIOLATION NOTICE**

On September 12, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) and Oil, Gas, and Minerals Division (OGMD) visited your Nixon Farms crude oil production facility located in Wisner Township, Michigan. The facility is covered by air use Permit to Install (PTI) number 20-12B issued by the DEQ, AQD.

During the visit, the following violations were noted:

Process Description	Rule/Permit Condition Violated	Comments
Nixon Farms crude oil production facility	AQD PTI 20-12B FGOILPRODUCTION SC IV.2	The wind shroud at the top of the flare was tilted and in bad shape.
	AQD PTI 20-12B FGOILPRODUCTION SC IV.2	A spill was noted by the drip tank for the produced gas going to the flare. On Sept 20, 2018, OGMD discovered the tank was bypassed. The tank remained bypassed as of Oct 30, 2018.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 26, 2018. The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Tuscola Energy, Inc. believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

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It should be noted the facility is subject to the conditions of a Consent Order (AQD 37-2015, OOGM 2997) which was effective as of December 17, 2015. The violations presented above may result in stipulated penalties for the facility.

Thank you for your attention to resolving the violations cited above. If you have any questions regarding the violations, or the actions necessary to bring this facility into compliance, please contact Matt Karl at 989-439-3779, or via correspondence addressed to Air Quality Division, 401 Ketchum Street, Suite B, Bay City, Michigan 48708.

Sincerely,



Ben Witkopp  
Environmental Engineer  
Air Quality Division  
989-894-6219

cc: Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Chris Ethridge, DEQ  
Ms. Jenine Camilleri, DEQ  
Mr. Chris Hare, DEQ  
Mr. James Armbruster, DEQ  
Mr. Matt Karl, DEQ