



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
BAY CITY DISTRICT OFFICE



PHILLIP D. ROOS
DIRECTOR

October 1, 2024

VIA EMAIL ONLY

Jeff Adler
Tuscola Energy, Inc.
920 North Water Street, Suite 201
Bay City, Michigan 48708

SRN: N1586, Tuscola County

Dear Jeff Adler:

VIOLATION NOTICE

On August 1, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Tuscola Energy, Inc. located at 7611 Bay City Forestville Road, Wisner Township, Michigan. The purpose of this inspection was to determine Tuscola Energy, Inc.'s compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 20-12C.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGOILPRODUCTION	PTI No. 20-12C, FGOILPRODUCTION, Special Condition (SC) III.1	Murphy switches on wellheads not operating properly.
FGOILPRODUCTION	PTI No. 20-12C, FGOILPRODUCTION, SC IV.1	Not following wellhead operational parameters.

During the course of the site inspection, it was concluded that Tuscola Energy, Inc. was not following the specific wellhead pumping restrictions that are required per PTI No. 20-12C. This is a violation of PTI No. 20-12C, FGOILPRODUCTION, Special Condition (SC) III.1.

During the inspection, murphy switches located on wellheads Nixon 4 and Nixon 5 were noted to not be operating properly. This is a violation of PTI No. 20-12C, FGOILPRODUCTION, SC IV.1.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 22, 2024 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the

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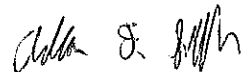
violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to Adam Shaffer at EGLE, AQD, Bay City District, at 401 Ketchum Street, Suite B, Bay City, Michigan 48708 or ShafferA1@Michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Tuscola Energy, Inc. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Adam Shaffer
Environmental Engineer
Air Quality Division
989-225-4789

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Gina McCann, EGLE
Kasey Todd, EGLE