

From: [Wayne Hyman](#)
To: [Gentle, Nathanael \(EGLE\)](#)
Cc: [Switzer, Annette \(EGLE\)](#); [Ethridge, Christopher \(EGLE\)](#); [Myott, Brad \(EGLE\)](#); [Confer, Trisha \(EGLE\)](#); [McCann, Gina \(EGLE\)](#); [Irwin, Andrea \(EGLE\)](#)
Subject: RE: P1075 and P1318 Violation Notices
Date: Friday, July 5, 2024 2:10:49 PM

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abuse@michigan.gov**

Nathanael,

I am writing in reference to violation notices issued on June 18, 2024 with respect to P1075 and P1318.

Both violations are the result of a single recompletion to the DRZ producing horizon in a single well (Blevins 3-11) in the Cranberry Lake Field, Clare County.

The Blevins 3-11 well in the Cranberry Lake Field, Clare County was recompleted into the DRZ formation with perforations at 4,870'-80'in 4 ½" casing on April 3, 2024.

After clean up, the well was turned into production on May 16, 2024. The H2S concentration was measured on May 24, 2024 and found to be 85,000 ppm H2S.

This was a significant change from the previously concentration used in Permit calculations of 45,000 ppm H2S. As a result of this new measurement, the well was shut in until contact was made with an EGLE representative to advise of the H2S concentration that had just been measured and to seek guidance.

The process piping was subsequently modified such that the associated gas produced by this well could no longer be connected to the A2 facility flare stack.

The associated gas from this well is now piped only to the Cranberry Lake Facility which removes the H2S component from the gas stream.

The well was then returned to production with its associated gas piped only to the Cranberry Lake Central Facility on May 31, 2024.

Subsequent to this, the safety system has been modified such that in the event of an Amine plant shutdown (the plant which removes the H2S component from the gas stream), the Blevins 3-11 well will automatically shut in (wellhead safety valve will close) such that no untreated gas from this well will be flared at the Cranberry Lake Central Facility.

The result of these modifications is such that the associated gas from the Blevins 3-11 well cannot be flared to atmosphere unless it is first cleaned by the functioning Amine Plant.

Applications to modify both P1075 (State A2 facility) and P1318 (Cranberry Lake facility) have been submitted to EGLE for review, comment and approval.

It is our opinion that these measures bring both facilities into compliance with appropriate

regulations and we would ask for further guidance if additional steps might be required.

As instructed, a printed copy of this response is being mailed to Jenine Camilleri, Enforcement Unit Supervisor at EGLE

Thank you for your time and attention to this matter,

Wayne P. Hyman
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