



October 9, 2018

Mr. Chance Collins  
Environmental Quality Analyst  
MDEQ-AQD Cadillac District Office  
120 West Chapin Street  
Cadillac, Michigan 49601-2158

Re: **Response to October 2, 2018 Violation Notice**  
SRN U691808175 – NMAG3 Booster CPF  
Enervest Operating LLC

Dear Mr. Collins:

Environmental Consulting & Technology, Inc. (ECT), on behalf of Enervest Operating, LLC (Enervest), compiled the following response to the Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) Violation Notice dated October 2, 2018 for the NMAG3 Booster CPF, SRN U691808175.

#### **Violation Cited**

During an MDEQ-AQD inspection on September 26, 2108, to determine Enervest's compliance with the requirements of the federal Clean Air Act, it was noted that Enervest had installed and commenced operation of an unpermitted compressor engine at the facility and was in violation of Rule 201.

#### **Background Information**

The NMAG3 Booster facility was acquired by Enervest from HRF Exploration & Production LLC on March 16, 2005. A Caterpillar G3406NA 215 hp internal combustion engine was operation at the facility without a Permit-to-Install (PTI) when it was acquired by Enervest.

#### **Current Status**

Enervest contacted ECT on August 22, 2018 regarding a possible engine swap at the NMAG3 Booster facility. In order to evaluate emissions associated with a potential engine swap, a PTI determination was completed for the Caterpillar G3406NA 215 hp on August 22, 2018. The PTI determination concluded that due to NOx emissions greater than 40 tons/year the engine requires a PTI. *PTE calculations for the CAT 3406NA 215 hp are attached.*

3399 Veterans  
Drive  
Traverse City, MI  
49684

(231) 946-8200

FAX  
(231) 946-8208

On August 23, 2018 the Caterpillar G3406NA 215 hp engine was shut-in and on September 26, 2018, the engine was removed from the Site.

**Violation Correction**

Enervest will be installing a CAT G3306NA 145 hp internal combustable engine at the facility. Per R336.1285(g), the maximum heat input (1,093,735 btu/hr) of the proposed internal combustion engine is less than 10,000,000 btu/hr. Therefore, the current engine is exempt from the requirement to obtain a PTI. In addition, potential-to-emit (PTE) calculations demonstrate that emissions of air contaminants from the proposed engine are below the significant levels that could require a PTI. *PTE calculations for the CAT G3306NA 145 hp are attached.*

No other emission units are located at the facility.

**Closing**

ECT sincerely appreciates the opportunity to provide our consulting services on this important project. Should you have questions or require additional information, please do not hesitate to contact the undersigned at 231.946.8200, [lharriger@ectinc.com](mailto:lharriger@ectinc.com), or [jlewandowski@ectinc.com](mailto:jlewandowski@ectinc.com).

Sincerely,

**ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.**



Lisa M. Harriger-Jones  
Senior Scientist



Jeremy S. Lewandowski  
Senior Engineer

cc: Mr. Jeff Riling – Enervest Operating

Attachments: CAT G3406NA 215hp PTE calculations  
CAT G3306NA 145hp PTE calculations