

Re: DEQ Violation

northstaropcon@aol.com <northstaropcon@aol.com>

Mon 2/8/2021 4:46 PM

To: Moran, Erin (EGLE) <MoranE@michigan.gov>

Cc: Lindgren, Jodi (EGLE) <LindgrenJ2@michigan.gov>; cathylaink@aol.com <cathylaink@aol.com>; schuster.don@gmail.com <schuster.don@gmail.com>

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Erin,

Thanks for the response. I will continue to work with Jodi through the process.

JPW

-----Original Message-----

From: Moran, Erin (EGLE) <MoranE@michigan.gov>

To: northstaropcon@aol.com <northstaropcon@aol.com>

Cc: Lindgren, Jodi (EGLE) <LindgrenJ2@michigan.gov>; cathylaink@aol.com <cathylaink@aol.com>; schuster.don@gmail.com <schuster.don@gmail.com>

Sent: Mon, Feb 8, 2021 4:38 pm

Subject: RE: DEQ Violation

John,

Thanks for your reply. I have discussed with Jodi and we think that right now think it would be best for you to contact our Permits department to evaluate your options. Here is a link for guidance document for permit application meetings: https://www.michigan.gov/documents/egle/tou-aqd-pti-PreapplicationMeetingGuidance_663372_7.pdf. The best person to contact about this would probably be Mark Mitchell at 517-284-6795 or MitchellM7@michigan.gov. They will work with you to evaluate your equipment to make sure you are correctly permitted, or to see if any permits can be voided.

Since the violations cited were also regarding recordkeeping, work with Jodi to make sure that you know which equipment you are running and that you are keeping the correct and necessary records for each piece of equipment.

Thanks,

Erin Moran

Enforcement Unit

Air Quality Division

Michigan Department of Environment, Great Lakes, and Energy

NEW: 517-275-0883 | morane@michigan.gov

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LET'S STAY SAFE TOGETHER

From: northstaropcon@aol.com <northstaropcon@aol.com>

Sent: Friday, February 5, 2021 5:59 PM

To: Moran, Erin (EGLE) <MoranE@michigan.gov>; Lindgren, Jodi (EGLE) <LindgrenJ2@michigan.gov>; cathylaink@aol.com; schuster.don@gmail.com
Subject: Fwd: DEQ Violation

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Erin,

We are in receipt of the compliance communication pertaining to the Wexford 10. After consideration of all the different issues involved we have concluded that the best course of action going forward is to terminate the old air quality permit for this location. As a bit of historical information, the Wexford 10 was originally built by Shell Oil Company back in the late 70's and the air quality permit was directly related to the amine sweetening plant which was removing a lot of hydrogen sulfide from the natural gas stream, then converting it into SO₂ through the flare. Fast forward to today, we still produce sour natural gas through the facility but the amine plant has not run in more than 10 years and will not be run again. In essence the existence of the permit, creates permit conditions which cannot be met at this time, at least not without the expenditure of a considerable amount of money that will not benefit our ongoing operations. We believe that eliminating the permit will eliminate the permit conditions, which will also eliminate the violations. It is our opinion that the rest of the facility which is still in operation (when market conditions justify operation) do not require any permitting through Air Quality Division and thus fall under the authority of Part 615 which is administered by the Office of Geological Survey. Out of due caution, we do want to move forward in such a way that we don't just terminate the permit before AQD has had ample opportunity to evaluate the process and equipment that is on location to make sure that AQD is in agreement.

I had a nice conversation about this issue with Ms Jodi Lindgren yesterday, and she is CC'd on this email, as is Ms Cathy Lain at Jaguar Energy LLC and Don Schuster our contract engineering consultant. Please let me know how we proceed, and we look forward to moving towards a resolution.

Thanks,

John Philip Ward

-----Original Message-----

From: Cathy Lain <cathylaink@aol.com>
To: northstaropcon@aol.com <northstaropcon@aol.com>
Sent: Mon, Jan 25, 2021 2:09 pm
Subject: DEQ Violation

John,

Please see the attached notice. Let me know what this is for.

Thanks,

Cathy