

**Tuscola Energy, Inc.**

920 North Water Street, Suite 213  
 Bay City, Michigan 48708

2/10/18

Mr. Ben Witkopp  
 Air Quality Division  
 Saginaw Bay District Office  
 401 Ketchum Street, Suite B  
 Bay City, MI 48708

Re: Response to January 30, 2018 Violation Notice: SRN N3228

Dear Mr. Witkopp

Below I have provided our responses to the Violation Notice.

**Response to SRN N3228**

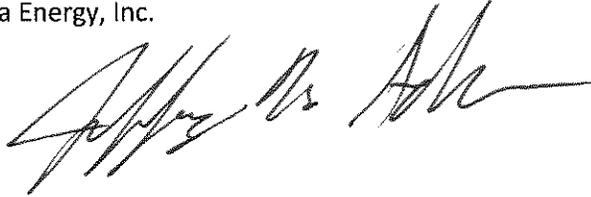
<b>Allegation</b>	<b>Response</b>
PTI 116-12 SC II 1 – Material Limit of 363# of H2S per day was exceeded 13 times from August 30, 2017 through December 15, 2017.	The B1B2 Flare went over its limit 13 times in 2017. It went over on 8/30 after the well was shut in for 4 days. 9/5 after being shut in for 3 days. We had more problems towards the end of October thru December 5 where the flare would go out and pressure would build up which would cause us to go over our limits for the next few days after opening back up the well. 10/28, 11/3, 11/5, 11/22, 11/24-27, 12/3-5. Every one of these had to do with the same issues of the flare going out and then pressures being built up and after we opened the well back up we would exceed our limit. We replaced the thermocouple and we haven't and any problems since.  We haven't gone over our limit since December 5, 2017.  We have also submitted a new Permit to Install application for this flare, which we anticipate giving us more flexibility to allow us to operate under our limits.
PTI 116-12 SC III 2 – Wells left open after pumping ceased every day to the present	We leave the gas open overnight on days the wells aren't shut in to keep the pressure from building up. If we shut in the wells every day then we would go over our H2S limits within the couple of hours of operation every day.  We have also submitted a new Permit to Install application for this flare, which we anticipate allowing us to leave the gas open after pumping has ceased.

Please contact me if you have any questions.

Respectfully submitted,

Tuscola Energy, Inc.

By:

A handwritten signature in black ink, appearing to read "Jeffrey M. Adler". The signature is written in a cursive style with a long horizontal stroke at the end.

Jeffrey M. Adler - President