

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection**

N646428232

FACILITY: QUICKSILVER RESOURCES INC. - RECKOW HOWES 1-26		SRN / ID: N6464
LOCATION: 9 Mile Rd, BEAR LAKE TWP		DISTRICT: Cadillac
CITY: BEAR LAKE TWP		COUNTY: MANISTEE
CONTACT:		ACTIVITY DATE: 12/10/2014
STAFF: Caryn Owens	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: This site is still operating, but the company is claiming exemptions for all on-site equipment.		
RESOLVED COMPLAINTS:		

On December 10, 2014, Ms. Caryn Owens of the DEQ-AQD stopped by the Breitburn Operating (formerly Quicksilver Resources, Inc.), Reckow Howe 1-26 facility, (SRN: N6464), located in Section 26, Township 23 North, Range 15 West in Bear Lake Township, Manistee County, Michigan. More specifically, the site was located on the south side of 9 mile Road approximately 0.4 miles east of Elm Road in Bear Lake Township. Permit to Installs (PTIs) 149-98 and 150-92 were voided in November 2006 and June 2005, respectively. The facility had an "operating" status in the DEQ-AQD's Michigan Air Compliance and Enforcement System (MACES), so the DEQ wanted to check on what operations were occurring at the site.

The weather conditions were sunny, with a temperature of approximately 25°F, and winds from the northeast. The site consisted of a jack pump, a process heater, a separator, a compressor engine, a glycol dehydrator and reboiler, and four 400 bbl above ground storage tanks. The jack pump was not operating at the time of the inspection. DEQ observed heat shimmers off the compressor engine stack, glycol dehydrator stack, and the northern process heater stack. Slight petroleum-like odors were present during the inspection, but were not present off-site. The compressor engine was painted blue, so a name plate identifying the model of the engine could not be located. The compressor engine was uncontrolled and a smaller engine, operating at 962 RPM.

PTI 149-98 was voided because all the equipment at the site was covered under exemptions. According to the company, the compressor engine is a 160 hp Waukesha engine with Model No. F-1197 GU. The compressor engine is less than 10 MMBTU per hour heat input which meets the exemption criteria in R336.1285(g). The glycol dehydrator is located at an oil well that is controlled by a condenser, so it is covered in exemption R336.1288 (b). The heaters at the site are covered under exemption R336.1282(b)(i), and the above ground storage tanks at the facility meet exemption R336.1284(e) and (h), and according to the company, the potential emissions at the facility are less than the significance thresholds in R336.1278.

PTI 150-92 was related to a soil vapor remediation system at site. The PTI was voided in June 2005 because the contaminated soil was remediated to acceptable levels, and the soil venting equipment is no longer in operation.

Based on the inspection, the activities at the site appear to be covered under the exemptions listed above, and no further action is necessary at this time.

NAME Caryn Owens

DATE 1/7/15

SUPERVISOR [Signature]