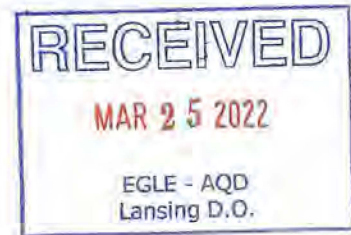


Tuscola Energy, Inc.

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



3/2/2022

Mr. Daniel A. McGeen
Environmental Quality Analyst
EGLE, AQD
PO Box 30242
Lansing, MI

Re: Response to Violation Notice: March 2, 2022

Dear Mr. Daniel A. McGeen

Below I have provided our responses to the Violation Notice.

ALLEGATION

For periods of time when the gas chromatograph was unavailable for determining hydrogen sulfide concentration, stain tubes were used on a daily basis but not on an hourly basis.

RESPONSE

We have had a number of issues with the chromatograph and returning it back to operational. We have been in contact with a company out of Houston that is helping us trouble shoot over the phone. After we did think we had it operational we quickly discovered that the readings weren't correct. Helium was being used at four times what it should be when operating correctly.

We have had the field shut in the last few days to repair gas leaks at the tanks so we haven't been able to give the chromatograph the attention it needs. We are hoping the leaks are fixed today and we can turn some wells back on. We plan to give the chromatograph our full attention for the rest of the week until we can get it working properly.

Under normal conditions we are operating well under our limit. The only times that we have an issue are shortly after the field has been shut in and gas pressures have accumulated. There doesn't seem to be much to be much fluctuation to concentrations from day to day let alone hour to hour. It is our goal to eventually not be required to have hourly concentration calculations and preferably only test concentrations weekly.

We will work to return the gas chromatograph to operational, but also want to propose a change in the ROP. In lieu of the gas chromatograph we would like to use dragger tubes to test concentrations on a weekly basis. This would allow us to decommission more of the gas plant, save the expensive costs on the helium needed to operate the chromatograph, and cost of repairs to the old equipment. We are open to beginning discussions as soon as possible.

Please contact me if you have any questions.

Respectfully submitted,

Tuscola Energy, Inc.

By:

A handwritten signature in blue ink, appearing to read "Jeffrey M. Adler". The signature is stylized and cursive.

Jeffrey M. Adler - President