



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SAGINAW BAY DISTRICT OFFICE



C. HEIDI GREYER  
DIRECTOR

November 7, 2016

Mr. Jeff Adler, President  
Tuscola Energy, Inc  
7998 M-25  
Akron, Michigan 48701

SRN: N7954, Tuscola County

Dear Mr. Adler:

**VIOLATION NOTICE**

On August 24, 2016, the Department of Environmental Quality (DEQ) visited your McPherson A-1-24 crude oil production facility located in Wisner Township, Michigan to check the status of cleanup from a previous oil spill. The cleanup progress was being monitored by the DEQ – Office of Oil Gas and Minerals (OOGM).

During the visit, the following violations were noted:

Process Description	Rule/Permit Condition Violated	Comments
McPherson crude oil production facility	AQD PTI 14-09D SC IV 1b	The wire for either the thermocouple or sparker was disconnected at top of flare.
	R324.1123 (OOGM Rule 1123)	The OOGM rule mirrors the AQD requirement.
McPherson crude oil production facility	AQD PTI 14-09D SC IV 2	The valve on the pressure relief line from the separator to the flare was closed. It is supposed to vent to the flare.
	R324.1124 (OOGM Rule 1124)	The OOGM rule mirrors the AQD requirement
McPherson crude oil production facility	R324.1119 (OOGM Rule 1119)	No H2S warning sign
	R324.1120 (OOGM Rule 1120)	Flow line marker on the ground

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 28, 2016. The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by

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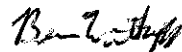
which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Tuscola Energy, Inc. believes the above observations or statements are inaccurate or do not constitute violation of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

It should be noted the facility is subject to the conditions of a Consent Order (AQD 37-2015, OOGM 2997) which was effective as of December 17, 2015. The violations presented above may result in stipulated penalties for the facility.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Ben Witkopp  
Environmental Engineer  
Air Quality Division  
989-894-6219

cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Chris Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Chris Hare, DEQ  
Mr. James Armbruster, DEQ