



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SAGINAW BAY DISTRICT OFFICE



KEITH CREAGH  
DIRECTOR

January 27, 2016

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

SRN: N7955, Tuscola County

Dear Mr. Adler:

**VIOLATION NOTICE**

On January 25, 2016, the Michigan Department of Environmental Quality (MDEQ) visited your Garner Road crude oil production facility located in Wisner Township, Michigan. The purpose of this inspection was to determine your facility's compliance with the requirements of the Office of Oil Gas and Minerals (OOGM) Part 615, Supervisor of Wells, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). The facility is also covered by air use permit 97-09A issued by the MDEQ, Air Quality Division (AQD).

During the visit, the following violations were noted:

Process Description	Rule/Permit Condition Violated	Comments
Garner Road Crude Oil Production Facility	AQD PTI 97-09A FGoilproduction IV 1.b	On the Nixon 12, the shutdown system wiring from the murphy switch was removed thereby rendering the system inoperable. Other well sites associated with this facility could not be checked due to lease road conditions.
Garner Road Crude Oil Production Facility	OOGM R334.1123	This OOGM rule mirrors the AQD permit condition.

Please immediately initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 12, 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 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 violations 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. If you have any questions regarding the violations, or the actions necessary to bring this facility into compliance, please contact me at the telephone number below, or via correspondence addressed to Air Quality Division, 401 Ketchum Street, Suite B, Bay City, Michigan 48708.

Sincerely,



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

cc/via email: Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Ms. Heidi Hollenbach, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Jim Armbruster, DEQ  
Mr. Chris Hare, DEQ