



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SAGINAW BAY DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

April 17, 2019

Mr. Russ Hilden  
Hilden Oil Company Inc  
3764 Pointe Shore Drive  
Brighton, Michigan 48114

SRN: N8189, Isabella County

Dear Mr. Hilden:

**VIOLATION NOTICE**

On November 14, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of the House 2-18 crude oil production facility located at Section 18, Town 15 North, Range 14 West, Isabella Township, Rosebush, Michigan. The purpose of this inspection was to determine Hilden Oil Company Inc's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 372-08.

After the inspection, staff noted the following:

Process Description	Rule/Permit Condition Violated	Comments
Crude oil production facility	PTI No. 372-08 SC VI.1 & 2	Records of H2S concentration testing and the mass flow rate of H2S going to the flare are unavailable.

A copy of the permit was provided to Hilden Oil Company Inc. and a records request was made. You have now stated Hilden Oil Company Inc. is unable to produce the records required by air use permit 372-08 until June 5, 2019, as you are out of the state. Subsequently, you have contacted the DEQ - Oil, Gas, and Minerals Division (OGMD) for oil production records who in turn has contacted me. Please be aware the AQD is not requesting copies of oil production records. The records being requested are listed in Section VI, items 1 and 2 in air use permit 372-08.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 12, 2019 as you have said you are out of the State until June 5, 2019. 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

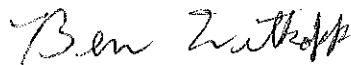
proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to the DEQ, AQD, Saginaw Bay District, at 401 Ketchum Street, Suite B, Bay City, Michigan 48708 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Hilden Oil Company 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.

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 number listed below.

Sincerely,



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

cc: Ms. Mary Ann Dolehanty, DEQ  
Dr. Eduardo Olaguer, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Jenine Camilleri, DEQ  
Mr. Chris Hare, DEQ