



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
BAY CITY DISTRICT OFFICE

EGLE
LIESL EICHLER CLARK
DIRECTOR

August 31, 2021

Sam Matthews
Cobra Oil and Gas
2251 Simmons Road
West Branch, Michigan 48661

SRN: P0568, Clare County

Dear Mr. Matthews:

VIOLATION NOTICE

On August 24, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Cobra Oil and Gas Summerfield Booster located in Township 20 North, Range 6 West, Southeast ¼ of the Southeast ¼ of Section 12, Harrison, Michigan. The purpose of this inspection was to determine Cobra Oil and Gas Summerfield Booster’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 to determine if permitting is needed for any emission units at the facility.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Glycol Dehydrator	Rule 201	The glycol dehydrator was operating without a Permit to Install (PTI) and does not appear to qualify for any permitting exemptions.

During this inspection, it was noted that Cobra Oil and Gas Summerfield Booster had installed and commenced operation of unpermitted equipment (glycol dehydrator) at this facility. AQD staff advised Cobra personnel on August 24, 2021, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the glycol dehydrator process equipment. An application form is available by request, or at the following website: www.michigan.gov/air (in the shaded box on the upper right-hand side of the page).

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Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by September 21, 2021 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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 EGLE, AQD, Bay City District, at 401 Ketchum Street Suite B, Bay City, Michigan 48708 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Cobra Oil and Gas 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 violation cited above and for the cooperation that was extended to me during my inspection of Cobra Oil and Gas Summerfield Booster. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Nathanael Gentle
Environmental Quality Analyst
Air Quality Division
989-778-0025
gentlen@michigan.gov

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