



REGION 8
DENVER, CO 80202

August 27, 2024

FILED

Aug 27, 2024

1:33 pm

**U.S. EPA REGION 8
HEARING CLERK**

VIA EMAIL ONLY

Matthew Sanchez
HSE & Compliance Manager
Zavanna Energy, LLC
1200 17th Street, Suite 1100
Denver, Colorado 80202
msanchez@zavanna.com

Re: Notice of Violation to Zavanna LLC. CAA-08-2024-0014

Dear Mr. Sanchez:

The U.S. Environmental Protection Agency (EPA) is issuing Zavanna LLC. (Zavanna) the enclosed Notice of Violation and offering an opportunity to confer regarding alleged violations of the Clean Air Act and its implementing regulations.

Specifically, the EPA alleges that Zavanna has violated or is violating at an oil and gas production facility in the State of North Dakota:

1. The Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015, and on or Before December 6, 2022, 40 C.F.R. Part 60, Subpart OOOOa; and
2. North Dakota Administrative Code, Title 33.1, Article 15, Chapter 7, Control of Organic Compounds, as incorporated into North Dakota's EPA-approved State Implementation Plan.

Section 113(a)(3) of the Clean Air Act provides that whenever, based on information available to the Administrator of the EPA, the Administrator finds that any person has violated, or is in violation of an applicable implementation plan or requirement of the Act, the Administrator may issue an administrative compliance order, issue an administrative penalty order, or bring a civil judicial action. 42 U.S.C.

§ 7413(a)(3). This NOV also serves as notice to the State of North Dakota under Section 113(a)(1). 42 U.S.C. § 7413(a)(1).

We are offering Zavanna an opportunity to confer with the EPA about the violations alleged in the NOV. The conference will provide an opportunity to present information on the specific alleged violations and any efforts that Zavanna has taken to comply or prevent future noncompliance.

To reach a timely conclusion of this matter, the EPA would like to hold an initial meeting on or before September 30, 2024. To schedule this meeting, please have your counsel call or email Colleen Adams, Assistant Regional Counsel for EPA Region 8, at (303) 312-6773 or adams.colleen@epa.gov by September 15, 2024.

Sincerely,

Suzanne J. Bohan, Director
Enforcement and Compliance Assurance
Division

Enclosure

cc (w/Encl.):

James L. Semerad, Director, Division of Air Quality, North Dakota Department of
Environmental Quality, jsemerad@nd.gov