



REGION 8
DENVER, CO 80202

February 10, 2025

FILED

Feb 10, 2025

3:29 pm

U.S. EPA REGION 8
HEARING CLERK

Ref: 8ENF-W-SD

SENT VIA EMAIL
DIGITAL READ RECEIPT REQUESTED

Mr. Liddon Kellman, Operations
Exxon Mobil Shute Creek Gas Plant
liddon.l.kellman@exxonmobil.com

Re: Administrative Order Addendum, regarding the Exxon Mobil – Shute Creek Gas Plant Public Water System, PWS ID #WY5600919, Docket # SDWA-08-2024-0039

Dear Mr. Kellman:

This is an Addendum to the Administrative Order (Order) issued to Exxon Mobil (the Company) regarding the Exxon Mobil – Shute Creek Gas Plant Public Water System (System) on August 19, 2024. The purpose of this letter is to approve the District's August 22, 2024, schedule (Schedule) for coming into consistent compliance with disinfection byproduct (DBP) maximum contaminant level (MCL) locational running annual average (LRAA) requirements. The Schedule is hereby incorporated into the Order pursuant to paragraph 14. Each milestone and deadline specified below is an enforceable provision of the Order.

Milestone

Deadline

Charcoal Filter Maintenance – Phase I	
Replace charcoal filter media in filters to increase Total Organic Carbon (TOC) removal	Completed
Conduct routine TOC monitoring to determine when filter media replacement is needed.	Ongoing
If charcoal filter maintenance is not successful in achieving compliance with	June 30, 2025

DBP MCL LRAA requirements, proceed to Phase II of the Schedule.	
Chlorine Concentration Control – Phase II	
Calculate daily contact time and adjust chlorine dosage based on the residual required to meet contact time requirements.	June 30, 2025
<p>If previous efforts have not resulted in consistent compliance with DBP MCL requirements, optimize process control for chlorine dosing to eliminate erratic swings in chlorine concentration by:</p> <p>1). Relocating the chemical injection to a location that is not affected by the lag time associated with the current injection location.</p> <p>And/or</p> <p>2). Increase flow to the chlorine analyzer so that it more quickly analyzes the chlorine residual and signals the chemical feed pumps to adjust dosing.</p> <p>And/or</p> <p>3). Shorten the response time of the chlorine pumps so that they can more quickly react to changes in chlorine content picked up by the treated water tank residual chlorine analyzer.</p> <p>Note: If Option 2 is chosen, a construction permit must be obtained by the Wyoming Department of Environmental Quality.</p>	December 31, 2025
<p>Notify the EPA of project completion Complete PWS Inventory Change Form and submit to the EPA: https://www.epa.gov/region8-waterops/epa-r8-public-water-system-inventory-change-form.</p>	January 10, 2026 (unless the EPA, in writing, issues prior approval for an extension of this deadline).

Within 10 calendar days of completing all steps included in the above Schedule, please notify the EPA of the project's completion as required by the Order. The Order also requires the System to achieve and maintain compliance with DBP MCL LRAA requirements by the final date specified in the approved Schedule. The EPA is authorized to seek penalties if these deadlines are not met. If the System has a reasonable basis to believe it may be unable to meet any deadline in the Schedule, it must notify the EPA well in advance of the Scheduled deadline to request an extension. The EPA may, in its discretion, consider granting an extension.

As a reminder, you are required to continue to provide the EPA with quarterly progress reports.

If you have any questions concerning this Addendum, please contact Rachel Brookins via email at brookins.rachel@epa.gov, or by phone at (800) 227-8917, extension 6509, or (303) 312-6509. Any questions from the Company's attorney should be directed to Mia Bearley, Senior Assistant Regional Counsel, via email at bearley.mia@epa.gov or by phone at (800) 227-8917, extension 6554, or (303) 312-6554.

Sincerely,

Colleen Rathbone, Manager
Water Enforcement Branch
Enforcement and Compliance Assurance Division

cc: WY DEQ/DOH
Lincoln County Commissioners
EPA Regional Hearing Clerk
Mitchell Haller, Environmental Foreman
Jenna Mays, Asset Manager
Veronica Profitt, Operator
Andria Grandpre, Operator
Hannes Stueckler, P.E., District Engineer, Wyoming DEQ