



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 8

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State of Utah

GARY R. HERBERT
Governor

SPENCER J. COX
Lieutenant Governor

Department of Environmental Quality

L. Scott Baird
Executive Director

DIVISION OF AIR QUALITY
Bryce C. Bird
Director

Ref: 8ENF-AT

March 20, 2020

1:53 PM

CERTIFIED MAIL NO.
RETURN RECEIPT REQUESTED

Received by

EPA Region VIII

Hearing Clerk

Chelsea Cantrelle
Health, Safety, Environmental & Regulatory Advisor
EP Energy E&P Company, L.P.
PO Box 4660
Houston, Texas 77210-4660

CT Corporation System
Registered Agent, EP Energy E&P Company, L.P.
1108 East South Union Avenue
Midvale, Utah 84047

Re: Notice of Violation to EP Energy E&P Company, L.P.

Dear Chelsea Cantrelle:

The U.S. Environmental Protection Agency (EPA) and the Utah Department of Environmental Quality, Division of Air Quality (UDAQ) issue the enclosed Notice of Violation to EP Energy E&P Company, L.P. (EP Energy) for alleged violations at EP Energy's oil and natural gas production operations located in the Uinta Basin.

The EPA and UDAQ jointly allege violations of Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification or Reconstruction Commenced After August 23, 2011, and on or before September 18, 2015, 40 C.F.R. part 60, subpart OOOO (NSPS OOOO); or, Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015, 40 C.F.R. part 60, subpart OOOOa (NSPS OOOOa), and provisions of approval orders issued by the State of Utah pursuant to an EPA-approved permitting program at the following facilities: Chestnut 3-17C4, DWR 3-22C6, El Paso 3-21B4, El Paso 4-21B4, Freeman 4-16B4, Hewett 2-6C4, Hunt 1-21B4, Kozar 2-5C4, Marquez 2-17C4, Moon 2-33C4, Moon 3-32C4, Thomas 3-4C4, Wollman 2-23C4.

Separately, the UDAQ alleges violations of the state-enforceable air quality regulations for the oil and gas industry at facilities under the State of Utah’s jurisdiction, and the EPA alleges violations of NSPS OOOO and NSPS OOOOa at facilities located on the Uintah and Ouray Indian Reservation.

We are offering EP Energy an opportunity to confer with the EPA and the UDAQ about the violations alleged in this Notice of Violation. The conference will provide an opportunity to present information on the specific alleged violations and any efforts EP Energy has taken to comply or prevent future noncompliance. Please contact Jessica Portmess, Sr. Assistant Regional Counsel, at (303) 312-7026 or portmess.jessica@epa.gov, within 30 days of receipt of this Notice of Violation if EP Energy would like to schedule a meeting.

Sincerely,



03/19/2020

Bryce C. Bird, Director
Utah Department of Environmental Quality
Division of Air Quality

DATE

Suzanne J. Bohan, Director
Enforcement and Compliance Assurance Division
EPA Region 8

DATE

Enclosures

cc (w/Encl.): Pilar Grantham, Sr. Counsel, EP Energy E&P Company, L.P.

Bryce Bird, Director, Utah Division of Air Quality, UDEQ

Ecc (w/Encl.): Pilar Grantham, Sr. Counsel, EP Energy E&P Company, L.P.

Jay Morris, Manager, Compliance Branch, Utah Division of Air Quality, UDEQ
Rik Ombach, Minor Source Compliance Branch Manager, Utah Division of Air Quality, UDEQ

Luke Duncan, Chairman, Ute Indian Tribe
Tony Small, Vice-Chairman, Ute Indian Tribe Vice-Chairman
Shaun Chapoose, Councilman, Ute Indian Tribe
Edred Secakuku, Councilman, Ute Indian Tribe
Ronald Wopsock, Councilman, Ute Indian Tribe
Sal Wopsock, Councilman, Ute Indian Tribe
Bruce Pargeets, Director, Ute Indian Tribe Energy & Minerals Department
Mike Natchees, Air Quality Program Director, Ute Tribe Energy & Minerals Department
Jeremy Patterson, Tribal Attorney, Fredericks Peebles & Morgan LLP

Jessica Portmess, EPA
Sara Loiacono, EPA
Jason Deardorff, EPA
Marina Thomas, Utah Attorney General’s Office