



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TEXAS 75202-2733**

September 6, 2011

CERTIFIED MAIL - RETURN RECEIPT REQUESTED 7009 2820 0004 2109 0703

Mr. Robert Whitley  
Facilities Superintendent  
Devon Gas Services, L.P.  
1209 County Road 1304  
Bridgeport, TX 76426

Re: Administrative Compliance Order Docket Number: CAA-06-2011-3334

Dear Mr. Whitley:

Enclosed is an Administrative Compliance Order (Order) issued to Devon Gas Services, L.P., for violation of the Clean Air Act (42 U.S.C. § 7412(r)(1)). The violation was identified based on our August 30, 2011, inspection of your Bridgeport Gas Plant facility located in Bridgeport, Wise County, Texas. The general duty clause violation found consists of a release of an extremely hazardous substance; specifically, methane.

Effective upon receipt of this Order, you shall fix, repair or replace the leaking components as noted in the enclosed Order, and comply with the provisions of this Order. The Environmental Protection Agency is committed to ensuring compliance with the requirements of the Clean Air Act, and my staff will assist you in any way possible.

If you have any questions, please contact Tony Robledo, of my staff, at (214) 665-8182.

Sincerely,

A handwritten signature in black ink, appearing to read "John Blevins".

John Blevins  
Director  
Compliance Assurance and  
Enforcement Division

Enclosure

cc: Michael de la Cruz  
Manager, Air Enforcement Section  
Texas Commission on Environmental Quality

John Richels  
Chief Executive Officer  
Devon Gas Processing, Inc.

U.S. ENVIRONMENTAL PROTECTION AGENCY-REGION 6  
ADMINISTRATIVE COMPLIANCE ORDER  
In the Matter of Devon Gas Services, L.P., Respondent  
Docket No. CAA-06-2011-3334

STATUTORY AUTHORITY

The following findings are made and Administrative Compliance Order (Order) issued under the authority vested in the Administrator of the United States Environmental Protection Agency (EPA), by Section 113(a)(3) of the Clean Air Act (Act), 42 U.S.C. § 7413(a)(3). The Administrator has delegated the authority to issue this Order to the Regional Administrator of EPA Region 6 who has further delegated such authority to the Director of the Compliance Assurance and Enforcement Division.

FINDINGS

1. Respondent, Devon Gas Services, L.P., is a "person" as defined by Section 302(e) of the Act, 42 U.S.C. § 7602(e).
2. At all times relevant to the violation alleged herein, Respondent operated a natural gas processing facility, the Bridgeport Gas Plant, located in Bridgeport, Wise County, Texas (the "Facility").
3. The Facility is a "stationary source" as defined by Section 112(r)(2)(C) of the Act, 42 U.S.C. 7412(r)(2)(C).
4. On August 30, 2011, EPA inspectors observed a release of pollutants from each of the three (3) tank hatches (nos. 102, 103, and a condensate tank) and six (6) compressor/engines (C10, C1, C2, C3, C4 and C5) utilizing the FLIR® GF 300/320 Infrared Camera.
5. Based on observations using the FLIR® GF 300/320 Infrared Camera, and process knowledge, the EPA inspectors determined that the release of pollutants described in paragraph four (4) contained methane.
6. Methane is a highly flammable and/or explosive substance.
7. An extremely hazardous substance under Section 112(r) of the Act, 42 U.S.C. § 7412(r) includes, but is not limited to, methane. The releases as described in paragraph four (4) are potentially explosive.
8. Section 112(r)(1) of the Act, 42 U.S.C. § 7412(r)(1), requires owners and operators to design and maintain a safe facility, taking such steps as are necessary to prevent releases of extremely hazardous substances.
9. On August 30, 2011, Respondent released an emission containing methane into the ambient air from a stationary source in violation of Section 112(r)(1) of the Clean Air Act (Act), 42 U.S.C. § 7412(r)(1).

ORDER

Based on these findings and pursuant to the authority of Section 113(a)(3) of the Act, 42 U.S.C. § 7413(a)(3), EPA orders that Respondent take the following actions upon receipt of this Order:

1. Fix, repair, or replace the leaking components that led to the release of an extremely hazardous substance as described in paragraph four (4), upon receipt of this Order.
2. Within fifteen (15) days of the receipt of this Order, Respondent shall provide written certification to the EPA, Region 6, that the activities required in the previous paragraph have been completed and shall include any supporting documents such as receipts and invoices. The written certification and supporting documentation shall be addressed to Mr. David F. Garcia, Associate Director, Compliance Assurance and Enforcement Division, (mail code 6EN-A), EPA Region 6, 1445 Ross Ave., Dallas, TX 75202. Respondent shall sign and certify under penalty of law that the certification and supporting documentation are true, accurate, and not misleading.

GENERAL PROVISIONS

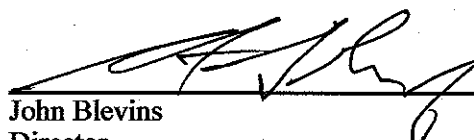
Issuance of this Order shall not be deemed an election by EPA to waive any administrative, judicial, civil or criminal action to seek penalties, fines or other relief under the Act for the violation alleged herein or other violations which may become known to EPA. EPA reserves the right to seek any remedy available under the law which it deems appropriate.

Failure to comply with this Order or the Act may result in the initiation of an administrative penalty action by EPA or a civil judicial penalty action by the U.S. Department of Justice.

Compliance with this Order does not relieve Respondent of its obligation to comply with all applicable federal, state and local laws.

SEP 06 2011

Date

  
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John Blevins  
Director  
Compliance Assurance and  
Enforcement Division