



Walter Wright, Jr.
wwright@mwlaw.com
(501) 688.8839

Risk Management Plan/Air Enforcement: U.S. Environmental Protection Agency and Beaverton, Michigan Oil/Gas Production Facility Enter into Expedited Settlement Agreement Addressing Alleged Violations

Arkansas Environmental, Energy, and Water Law Blog

11/04/2016

The United States Environmental Protection Agency ("EPA") and Cobra Oil and Gas Corporation ("Cobra") entered into an October 4th Expedited Settlement Agreement ("ESA") to address alleged violations of the Clean Air Act Risk Management Plan ("RMP") regulations.

Cobra is stated to operate a facility in Beaverton, Michigan.

The facility is stated to have been the subject of an EPA compliance inspection on March 30, 2016. The inspection allegedly involved a determination as to whether the facility was in compliance with the RMP regulations promulgated pursuant to Section 112(r) of the Clean Air Act (the regulations set forth at 40 C.F.R. Part 68).

The March 30th inspection, along with documents submitted by Cobra, allegedly identified the following violations:

- 40 C.F.R. § 68.48(a)(4) – failure to compile and maintain up-to-date safety information related to flammable storage vessel; specifically the U1 Forms applicable to the vessel
- 40 C.F.R. § 68.56(a) – failure to prepare procedures to maintain the on-going mechanical integrity of piping and LEL detectors

The ESA assesses Cobra a civil penalty of \$1,200.

[A copy of the ESA can be downloaded here.](#)