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## Air Enforcement: Alabama Department of Environmental Management and Washington County Oil and Gas Production/Injection Facility Enter into Consent Order

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The Alabama Department of Environmental Management (“ADEM”) and Crosbys Creek Oil & Gas, LLC (“Crosbys”) entered into a November 5th Consent Order (“CO”) addressing an alleged violation of an air permit.

The CO states that Crosbys operates an oil and gas production and injection facility (“Facility”) in Washington County, Alabama.

The Facility operates under certain Synthetic Minor Operating Permits described in the CO. Proviso 22 of the Permits is describing as stating:

The SO<sub>2</sub> emission from this facility shall not exceed 95 tons in any 12 month period.

The CO provides that on March 17th Crosbys informed ADEM that the Facility had become aware of elevated sulfur dioxide (“SO<sub>2</sub>”) emissions and that it was approaching its 95 TPY SO<sub>2</sub> limit. ADEM is stated to have subsequently received the monthly emission report for the month of February, which documented that the Facility exceeded the 95 TPY rolling average with an emission total of 162.5 tons of SO<sub>2</sub> from July 2020 through February 2021.

Crosbys is stated to have indicated that the elevated emissions were caused by the vapor recovery unit shutting down. Further, Crosbys references plans to install digit flow meters at the Facility to monitor the amount of gas flared on a daily basis.

The CO provides that Crosbys neither admits nor denies ADEM’s contentions.

A civil penalty of \$50,000 is assessed.

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