

EXECUTIVE SUMMARY - ENFORCEMENT MATTER Page 1 of 2
DOCKET NO.: 2007-1071-IWD-E **TCEQ ID:** RN101720241 **CASE NO.:** 34124
RESPONDENT NAME: Halliburton Energy Services, Inc.

ORDER TYPE:		
<input checked="" type="checkbox"/> 1660 AGREED ORDER	<input type="checkbox"/> FINDINGS AGREED ORDER	<input type="checkbox"/> FINDINGS ORDER FOLLOWING SOAH HEARING
<input type="checkbox"/> FINDINGS DEFAULT ORDER	<input type="checkbox"/> SHUTDOWN ORDER	<input type="checkbox"/> IMMINENT AND SUBSTANTIAL ENDANGERMENT ORDER
<input type="checkbox"/> AMENDED ORDER	<input type="checkbox"/> EMERGENCY ORDER	
CASE TYPE:		
<input type="checkbox"/> AIR	<input type="checkbox"/> MULTI-MEDIA (check all that apply)	<input type="checkbox"/> INDUSTRIAL AND HAZARDOUS WASTE
<input type="checkbox"/> PUBLIC WATER SUPPLY	<input type="checkbox"/> PETROLEUM STORAGE TANKS	<input type="checkbox"/> OCCUPATIONAL CERTIFICATION
<input checked="" type="checkbox"/> WATER QUALITY	<input type="checkbox"/> SEWAGE SLUDGE	<input type="checkbox"/> UNDERGROUND INJECTION CONTROL
<input type="checkbox"/> MUNICIPAL SOLID WASTE	<input type="checkbox"/> RADIOACTIVE WASTE	<input type="checkbox"/> DRY CLEANER REGISTRATION
<p>SITE WHERE VIOLATION(S) OCCURRED: Halliburton Energy Services North Belt Facility, located approximately one mile south of Bush International Airport and one mile east of Aldine Westfield Road and 0.5 miles west of John Kennedy Boulevard, Harris County, Texas</p> <p>TYPE OF OPERATION: A multi-building complex</p> <p>SMALL BUSINESS: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>OTHER SIGNIFICANT MATTERS: There are no complaints. There is no record of additional pending enforcement actions regarding this facility location.</p> <p>INTERESTED PARTIES: No one other than the ED and the Respondent has expressed an interest in this matter.</p> <p>COMMENTS RECEIVED: The <i>Texas Register</i> comment period expired on November 12, 2007. No comments were received.</p> <p>CONTACTS AND MAILING LIST: TCEQ Attorney/SEP Coordinator: None TCEQ Enforcement Coordinator: Mr. J. Craig Fleming, Enforcement Division, Enforcement 3, MC 149, (512) 239-5806; Mr. Bryan Sinclair, Enforcement Division, MC 219, (512) 239-2171 Respondent: Mr. Len Cooper, Senior Vice President, Halliburton Energy Services, Inc., P. O. Box 60087, Houston, Texas 77205 Respondent's Attorney: Not represented by counsel on this enforcement matter</p>		

VIOLATION SUMMARY CHART:

VIOLATION INFORMATION	PENALTY CONSIDERATIONS	CORRECTIVE ACTIONS TAKEN/REQUIRED
<p>Type of Investigation: <input type="checkbox"/> Complaint <input type="checkbox"/> Routine <input type="checkbox"/> Enforcement Follow-up <input checked="" type="checkbox"/> Records Review</p> <p>Date(s) of Complaints Relating to this Case: None</p> <p>Date of Record Review Relating to this Case: June 11, 2007</p> <p>Date of NOE Relating to this Case: June 21, 2007 (NOE)</p> <p>Background Facts: This was a routine record review conducted for compliance with the water quality program. One significant program violation was observed.</p> <p>WATER</p> <p>Failure to comply with the permitted effluent limitations [30 TEX. ADMIN. CODE § 305.125(1), TEX. WATER CODE § 26.121(a), and TPDES Permit No. 04624, Effluent Limitations and Monitoring Requirements No. 1].</p>	<p>Total Assessed: \$2,820</p> <p>Total Deferred: \$564 <input checked="" type="checkbox"/> Expedited Settlement <input type="checkbox"/> Financial Inability to Pay</p> <p>SEP Conditional Offset: \$0</p> <p>Total Paid to General Revenue: \$2,256</p> <p>Site Compliance History Classification <input type="checkbox"/> High <input checked="" type="checkbox"/> Average <input type="checkbox"/> Poor</p> <p>Person Compliance History Classification <input type="checkbox"/> High <input checked="" type="checkbox"/> Average <input type="checkbox"/> Poor</p> <p>Major Source: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Applicable Penalty Policy: September 2002</p>	<p>Corrective Actions Taken:</p> <p>The Executive Director recognizes that the Respondent has implemented the following corrective measures at the Facility by March 31, 2007 and came into compliance during May 2007:</p> <p>a) Increased monitoring to a daily basis for an interim period to better control the discharge of ammonia;</p> <p>b) Established redefined guidelines for the use of cleaning compounds to control the discharge of ammonia from various operations in the Facility;</p> <p>c) Introduced process modifications in the Facility's kitchen to control the discharge of ammonia; and</p> <p>d) Returned into compliance with its permitted effluent limits on May 31, 2007.</p>

Additional ID No(s): TPDES Permit No. 04624



Policy Revision 2 (September 2002)

Penalty Calculation Worksheet (PCW)

PCW Revision June 26, 2007

DATES	Assigned	2-Jul-2007	Screening	5-Jul-2007	EPA Due	
	PCW	6-Jul-2007				

RESPONDENT/FACILITY INFORMATION			
Respondent	Halliburton Energy Services, Inc.		
Reg. Ent. Ref. No.	RN101720241		
Facility/Site Region	12-Houston	Major/Minor Source	Minor

CASE INFORMATION			
Enf./Case ID No.	34124	No. of Violations	1
Docket No.	2007-1071-IWD-E	Order Type	1660
Media Program(s)	Water Quality	Enf. Coordinator	J. Craig Fleming
Multi-Media		EC's Team	EnforcementTeam 3
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$10,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$3,000
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ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

Compliance History	19% Enhancement	Subtotals 2, 3, & 7	\$570
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Notes: A 19% enhancement is recommended for three months of self-reported effluent violations, and two NOVs for non-similar violations.

Culpability	No	0% Enhancement	Subtotal 4	\$0
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Notes: The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply	25% Reduction	Subtotal 5	\$750
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	Before NOV	NOV to EDRP/Settlement Offer
Extraordinary		
Ordinary	X	
N/A		(mark with x)

Notes: The Respondent came into compliance on May 31, 2007 prior to the Notice of Enforcement dated June 21, 2007.

Total EB Amounts	\$108	0% Enhancement*	Subtotal 6	\$0
Approx. Cost of Compliance	\$2,000	*Capped at the Total EB \$ Amount		

SUM OF SUBTOTALS 1-7	Final Subtotal	\$2,820
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OTHER FACTORS AS JUSTICE MAY REQUIRE		Adjustment	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage. (Enter number only; e.g. -30 for -30%.)

Notes:

Final Penalty Amount	\$2,820
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$2,820
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DEFERRAL	20% Reduction	Adjustment	-\$564
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Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.)

Notes:

Deferral offered for expedited settlement.

PAYABLE PENALTY	\$2,256
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Screening Date 5-Jul-2007

Docket No. 2007-1071-IWD-E

PCW

Respondent Halliburton Energy Services, Inc.

Policy Revision 2 (September 2002)

Case ID No. 34124

PCW Revision June 26, 2007

Reg. Ent. Reference No. RN101720241

Media [Statute] Water Quality

Enf. Coordinator J. Craig Fleming

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Enter Number Here	Adjust.
NOVs	Written NOVs with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	3	15%
	Other written NOVs	2	4%
Orders	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	0	0%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgements or consent decrees meeting criteria)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	0	0%

Please Enter Yes or No

Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 19%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Average Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

A 19% enhancement is recommended for three months of self-reported effluent violations, and two NOVs for non-similar violations.

Total Adjustment Percentage (Subtotals 2, 3, & 7) 19%

Screening Date	5-Jul-2007	Docket No.	2007-1071-IWD-E	PCW
Respondent	Halliburton Energy Services, Inc.	<i>Policy Revision 2 (September 2002)</i>		
Case ID No.	34124	<i>PCW Revision June 26, 2007</i>		
Reg. Ent. Reference No.	RN101720241			
Media [Statute]	Water Quality			
Enf. Coordinator	J. Craig Fleming			

Violation Number	1
Rule Cite(s)	30 Tex. Admin. Code § 305.125(1), Tex. Water Code § 26.121(a), and TPDES Permit No. 04624, Effluent Limitations and Monitoring Requirements No. 1
Violation Description	Failed to comply with the permitted effluent limitations as documented in a record review conducted on June 11, 2007. See attached table.

Base Penalty \$10,000

>> Environmental, Property and Human Health Matrix

OR	Harm			Percent	
	Release	Major	Moderate		Minor
	Actual				x
Potential				10%	

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	Percent

Matrix Notes
 A simplified model was used to evaluate Ammonia Nitrogen to determine whether the discharged amounts of pollutants exceeded levels protective of human health or the environment. Daily Average Flow was also considered. As a result of these discharges, human health or the environment has been exposed to insignificant amounts of pollutants which do not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$9,000

\$1,000

Violation Events

Number of Violation Events Number of violation days

<i>mark only one with an x</i>	daily	<input type="text"/>
	monthly	<input type="text"/>
	quarterly	x
	semiannual	<input type="text"/>
	annual	<input type="text"/>
	single event	<input type="text"/>

Violation Base Penalty \$3,000

Three quarterly events are recommended.

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount

Violation Final Penalty Total

This violation Final Assessed Penalty (adjusted for limits)

Economic Benefit Worksheet

Respondent Halliburton Energy Services, Inc.
 Case ID No. 34124
 Reg. Ent. Reference No. RN101720241
 Media Water Quality
 Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
No commas or \$							

Delayed Costs

Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)	\$2,000	1-May-2006	31-May-2007	1.1	\$108	n/a	\$108

Notes for DELAYED costs
 The estimated cost for additional oversight and sampling which could have reduced or alleviated the exceedances. The Date Required is the date the noncompliances started. The Final Date is the date of compliance.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0

Notes for AVOIDED costs

NA

Approx. Cost of Compliance

\$2,000

TOTAL

\$108

Compliance History

Customer/Respondent/Owner-Operator: CN601551203 Halliburton Energy Services, Inc. Classification: AVERAGE Rating: 2.59

Regulated Entity: RN101720241 HALLIBURTON ENERGY SERVICES NORTH BELT FACILITY Classification: AVERAGE Site Rating: 1.25

ID Number(s):

AIR NEW SOURCE PERMITS	REGISTRATION	54832
INDUSTRIAL AND HAZARDOUS WASTE GENERATION	EPA ID	TXD097310338
INDUSTRIAL AND HAZARDOUS WASTE GENERATION	SOLID WASTE REGISTRATION # (SWR)	30619
PETROLEUM STORAGE TANK REGISTRATION	REGISTRATION	31370
STORMWATER	PERMIT	TXR05L658
WASTEWATER	PERMIT	WQ0004624000
WASTEWATER	PERMIT	TX0078638
WASTEWATER	PERMIT	TPDES0078638
IHW CORRECTIVE ACTION	SOLID WASTE REGISTRATION # (SWR)	30619

Location: Approximately one mile south of Bush Intercontinental Airport and one mile east of Aldine Westfield Road and 0.5 mile west of John Kennedy Boulevard, Harris County, Texas
Rating Date: 9/1/2006 Repeat Violator: NO

TCEQ Region: REGION 12 - HOUSTON

Date Compliance History Prepared: July 05, 2007

Agency Decision Requiring Compliance History: Enforcement

Compliance Period: July 05, 2002 to July 05, 2007

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: J. Craig Fleming Phone: (512) 239-5806

Site Compliance History Components

- | | |
|--|------------|
| 1. Has the site been in existence and/or operation for the full five year compliance period? | Yes |
| 2. Has there been a (known) change in ownership of the site during the compliance period? | No |
| 3. If Yes, who is the current owner? | <u>N/A</u> |
| 4. If Yes, who was/were the prior owner(s)? | N/A |
| 5. When did the change(s) in ownership occur? | N/A |

Components (Multimedia) for the Site :

- A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.
N/A
- B. Any criminal convictions of the state of Texas and the federal government.
N/A
- C. Chronic excessive emissions events.
N/A
- D. The approval dates of investigations. (CCEDS Inv. Track. No.)
- | | | | |
|---|------------|----------|--|
| 1 | 10/20/2004 | (333415) | |
| 2 | 11/17/2004 | (339924) | |
| 3 | 06/30/2005 | (430017) | |
| 4 | 06/26/2007 | (563803) | |
- E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)
- | | | | |
|--------------|---|----------|-----------------------|
| Date: | 10/19/2004 | (333415) | |
| Self Report? | NO | | Classification: Minor |
| Citation: | 30 TAC Chapter 319, SubChapter A 319.11(d) | | |
| Description: | Failure to correctly mount the staff gauge upstream of the v-notch weir a distance which is at least four to six times the maximum expected head. | | |
| Self Report? | NO | | Classification: Minor |

Citation: 30 TAC Chapter 317 317.4(a)(8)
 30 TAC Chapter 317 317.7(i)
 Description: Failure to annually test and certify the RPZ on the incoming potable water line.
 Date: 06/30/2005 (430017) Classification: Moderate
 Self Report? NO

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
 30 TAC Chapter 305, SubChapter F 305.125(17)
 Description: NON-RPT VIOS FOR MONIT PER OR PIPE
 Date: 05/31/2006 Classification: Moderate
 Self Report? YES

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
 TWC Chapter 26 26.121 (a)(G)
 Description: Failed to meet the limit for one or more permit parameter
 Date: 01/31/2007 Classification: Moderate
 Self Report? YES

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
 TWC Chapter 26 26.121 (a)(G)
 Description: Failed to meet the limit for one or more permit parameter
 Date: 02/28/2007 Classification: Moderate
 Self Report? YES

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)
 TWC Chapter 26 26.121 (a)(G)
 Description: Failed to meet the limit for one or more permit parameter

F. Environmental audits.

N/A

G. Type of environmental management systems (EMSs).

N/A

H. Voluntary on-site compliance assessment dates.

N/A

I. Participation in a voluntary pollution reduction program.

N/A

J. Early compliance.

N/A

Sites Outside of Texas

N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



**IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
HALLIBURTON ENERGY SERVICES,
INC.
RN101720241**

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**BEFORE THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY**

AGREED ORDER DOCKET NO. 2007-1071-IWD-E

I. JURISDICTION AND STIPULATIONS

At its _____ agenda, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Halliburton Energy Services, Inc. ("Halliburton") under the authority of TEX. WATER CODE chs. 7 and 26. The Executive Director of the TCEQ, through the Enforcement Division, and Halliburton appear before the Commission and together stipulate that:

1. Halliburton owns and operates a multi-building complex located approximately one mile south of Bush Intercontinental Airport and one mile east of Aldine Westfield Road and 0.5 mile west of John Kennedy Boulevard, Harris County, Texas (the "Facility").
2. Halliburton has caused, suffered, allowed or permitted the discharge of any waste or the performance of any activity in violation of TEX. WATER CODE ch. 26 or any rule, permit, or order of the Commission.
3. The Commission and Halliburton agree that the Commission has jurisdiction to enter this Agreed Order, and that Halliburton is subject to the Commission's jurisdiction.
4. Halliburton received notice of the violations alleged in Section II ("Allegations") on or about June 26, 2007.
5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by Halliburton of any violation alleged in Section II ("Allegations"), nor of any statute or rule.

6. An administrative penalty in the amount of Two Thousand Eight Hundred Twenty Dollars (\$2,820) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). Halliburton has paid Two Thousand Two Hundred Fifty-Six Dollars (\$2,256) of the administrative penalty and Five Hundred Sixty-Four Dollars (\$564) is deferred contingent upon Halliburton's timely and satisfactory compliance with all the terms of this Agreed Order. The deferred amount will be waived upon full compliance with the terms of this Agreed Order. If Halliburton fails to timely and satisfactorily comply with all requirements of this Agreed Order, the Executive Director may require Halliburton to pay all or part of the deferred penalty.
7. Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.
8. The Executive Director of the TCEQ and Halliburton have agreed on a settlement of the matters alleged in this enforcement action, subject to the approval of the Commission.
9. The Executive Director recognizes that Halliburton has implemented the following corrective measures at the Facility by March 31, 2007 and came into compliance during May 2007:
 - a. Increased monitoring to a daily basis for an interim period to better control the discharge of ammonia;
 - b. Established redefined guidelines for the use of cleaning compounds to control the discharge of ammonia from various operations in the Facility;
 - c. Introduced process modifications in the Facility's kitchen to control the discharge of ammonia; and
 - d. Returned to compliance with permitted effluent limits on May 31, 2007.
10. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that Halliburton has not complied with one or more of the terms or conditions in this Agreed Order.
11. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.
12. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable.

II. ALLEGATIONS

As owner and operator of the Facility, Halliburton is alleged to have failed to comply with the permitted effluent limitations, in violation of 30 TEX. ADMIN. CODE § 305.125(1), TEX. WATER CODE § 26.121(a), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. 04624, Effluent Limitations and Monitoring Requirements No. 1, as documented during a record review conducted on June 11, 2007, as indicated in the table below.

Effluent Violation Table			
Permitted Effluent Limits	Flow Daily Maximum 0.070 MGD	Ammonia Nitrogen Daily Average of 3.0 mg/L	Ammonia Nitrogen Daily Maximum of 10.0 mg/L
May 2006	0.072	C	C
January 2007	C	5.38	15.1
February 2007	C	4.28	16.8

mg/L = milligrams per Liter	MGD = million gallons per day	C = compliant
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III. DENIALS

Halliburton generally denies each allegation in Section II ("Allegations").

IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that Halliburton pay an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and Halliburton's compliance with all the terms and conditions set forth in this Agreed Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations, which are not raised here. Administrative penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: Halliburton Energy Services, Inc., Docket No. 2007-1071-IWD-E" to:

Financial Administration Division, Revenues Section
 Attention: Cashier's Office, MC 214
 Texas Commission on Environmental Quality
 P.O. Box 13088
 Austin, Texas 78711-3088

2. The provisions of this Agreed Order shall apply to and be binding upon Halliburton. Halliburton is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Facility operations referenced in this Agreed Order.
3. This Agreed Order, issued by the Commission, shall not be admissible against Halliburton in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.

4. This agreement may be executed in multiple counterparts, which together shall constitute a single original instrument. Any executed signature page to this Agreement may be transmitted by facsimile transmission to the other parties, which shall constitute an original signature for all purposes.
5. Under 30 TEX. ADMIN. CODE § 70.10(b), the effective date is the date of hand-delivery of the Order to Halliburton, or three days after the date on which the Commission mails notice of the Order to Halliburton, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

John Szdlui

For the Executive Director

12/03/2007

Date

I, the undersigned, have read and understand the attached Agreed Order. I am authorized to agree to the attached Agreed Order on behalf of the entity indicated below my signature, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I also understand that failure to comply with the Ordering Provisions, if any, in this order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- Referral of this case to the Attorney General's Office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions;
- Automatic referral to the Attorney General's Office of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.

Len Cooper

Signature

9/19/07

Date

Len Cooper

Name (Printed or typed)
Authorized Representative of
Halliburton Energy Services, Inc

Senior Vice President - Supply Chain

Title
Management

Instructions: Send the original, signed Agreed Order with penalty payment to the Financial Administration Division, Revenues Section at the address in Section IV, Paragraph 1 of this Agreed Order.



