

**Executive Summary – Enforcement Matter – Case No. 60832**  
**Targa Frio LaSalle Pipeline LP f/k/a Frio LaSalle Pipeline, LP**  
**RN106040488**  
**Docket No. 2021-0727-AIR-E**

**Order Type:**

1660 Agreed Order

**Findings Order Justification:**

N/A

**Media:**

AIR

**Small Business:**

No

**Location(s) Where Violation(s) Occurred:**

Lancaster Ranch Compressor Station and Treating Facility, located approximately 2,450 feet northeast of the intersection of Farm-to-Market Road 1583 and Highway 85, Dilley, Frio County

**Type of Operation:**

Natural gas compressor station

**Other Significant Matters:**

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

**Texas Register Publication Date:** August 9, 2024

**Comments Received:** No

***Penalty Information***

**Total Penalty Assessed:** \$70,104

**Total Paid to General Revenue:** \$70,104

**Total Due to General Revenue:** \$0

Payment Plan: N/A

**Compliance History Classifications:**

Person/CN - Satisfactory

Site/RN - Unsatisfactory

**Major Source:** Yes

**Statutory Limit Adjustment:** N/A

**Applicable Penalty Policy:** January 2021

***Investigation Information***

**Complaint Date(s):** N/A

**Complaint Information:** N/A

**Date(s) of Investigation:** March 31, 2021 and October 19, 2021

**Date(s) of NOE(s):** May 25, 2021 and January 4, 2022

**Executive Summary – Enforcement Matter – Case No. 60832**  
**Targa Frio LaSalle Pipeline LP f/k/a Frio LaSalle Pipeline, LP**  
**RN106040488**  
**Docket No. 2021-0727-AIR-E**

***Violation Information***

1. Failed to submit a deviation report for at least each six-month period after permit issuance and failed to submit the deviation report no later than 30 days after the end of each reporting period. Specifically, the Respondent determined that no deviations occurred and did not submit a deviation report for the May 20, 2017 through November 19, 2017 reporting period, but a deviation report should have been submitted by December 19, 2017 to report the deviations for failing to report the 117 non-reportable emissions events that occurred from May 21, 2017 to November 18, 2017 [30 TEX. ADMIN. CODE §§ 122.143(4) and 122.145(2)(B) and (C), Federal Operating Permit ("FOP") No. 03419/General Operating Permit ("GOP") No. 514, Terms and Conditions No. (b)(2), and TEX. HEALTH & SAFETY CODE § 382.085(b)].
2. Failed to submit a deviation report for at least each six-month period after permit issuance and failed to submit the deviation report no later than 30 days after the end of each reporting period. Specifically, the Respondent determined that no deviations occurred and did not submit a deviation report for the November 20, 2017 through May 19, 2018 reporting period, but a deviation report should have been submitted by June 18, 2018 to report the deviations for failing to report the 126 non-reportable emissions events that occurred from November 23, 2017 to May 19, 2018 [30 TEX. ADMIN. CODE §§ 122.143(4) and 122.145(2)(B) and (C), FOP No. 03419/GOP No. 514, Terms and Conditions No. (b)(2), and TEX. HEALTH & SAFETY CODE § 382.085(b)].
3. Failed to report all instances of deviations. Specifically, the deviation report for the May 20, 2018 through November 19, 2018 reporting period did not include the deviations for failing to report the 169 non-reportable emissions events that occurred from May 20, 2018 to November 14, 2018 [30 TEX. ADMIN. CODE §§ 122.143(4) and 122.145(2)(A), FOP No. 03419/GOP No. 514, Terms and Conditions No. (b)(2), and TEX. HEALTH & SAFETY CODE § 382.085(b)].
4. Failed to submit a deviation report for at least each six-month period after permit issuance and failed to submit the deviation report no later than 30 days after the end of each reporting period. Specifically, the Respondent determined that no deviations occurred and did not submit a deviation report for the November 20, 2018 through May 19, 2019 reporting period, but a deviation report should have been submitted by June 18, 2019 to report the deviations for failing to report the 204 non-reportable emissions events that occurred from November 20, 2018 to May 19, 2019 [30 TEX. ADMIN. CODE §§ 122.143(4) and 122.145(2)(B) and (C), FOP No. 03419/GOP No. 514, Terms and Conditions No. (b)(2), and TEX. HEALTH & SAFETY CODE § 382.085(b)].
5. Failed to report all instances of deviations, in violation of 30 TEX. ADMIN. CODE §§ 122.143(4) and 122.145(2)(A), FOP No. 03419/GOP No. 514, Terms and Conditions No. (b)(2), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the deviation report for the May 20, 2019 through November 19, 2019 reporting period did not include the deviations for failing to report the 146 non-reportable emissions events that occurred from May 21, 2019 to November 17, 2019.

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6. Failed to report all instances of deviations. Specifically, the deviation report for the November 20, 2019 through May 19, 2020 reporting period did not include the deviations for failing to report the 87 non-reportable emissions events that occurred from November 21, 2019 to May 17, 2020 [30 TEX. ADMIN. CODE §§ 122.143(4) and 122.145(2)(A), FOP No. 03419/GOP No. 514, Terms and Conditions No. (b)(2), and TEX. HEALTH & SAFETY CODE § 382.085(b)].

7. Failed to submit an initial notification for a reportable emissions event no later than 24 hours after the discovery of an emissions event. Specifically, the initial notification for Incident No. 366898 was due by September 19, 2021 at 12:00 a.m., but was not submitted until September 20, 2021 at 4:08 p.m. [30 TEX. ADMIN. CODE §§ 101.201(a)(1)(B) and 122.143(4), FOP No. 03419/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(40)(F), and TEX. HEALTH & SAFETY CODE § 382.085(b)].

8. Failed to prevent unauthorized emissions. Specifically, the Respondent released 1,045.45 pounds ("lbs") of nitrogen oxides, 4,221.66 lbs of sulfur dioxide, 2,087.10 lbs of carbon monoxide, and 44.90 lbs of hydrogen sulfide from the Maintenance Flare, Emissions Point Number MFLARE, during an emissions event (Incident No. 366898) that began on September 18, 2021 and lasted 59 hours and 16 minutes [30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration Number 94152, FOP No. 03419/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b)].

***Corrective Actions/Technical Requirements***

**Corrective Action(s) Completed:**

The Respondent implemented the following corrective measures at the Site:

- a. On September 20, 2021, submitted the initial notification for Incident No. 366898; and
- b. By January 24, 2022, communicated with the producer customers the importance of gas quality being injected into the gathering lines and the consequences if certain quality parameters are exceeded, installed multiple oxygen sensors and alarms within the facility and pipelines, installed automatic shut-off valves on inlet gathering pipelines, and updated operating procedures and training to include measures to be taken in the event of high oxygen levels in the inlet piping or at the Site in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 366898.

**Technical Requirements:**

The Order will require the Respondent to:

- a. Within 30 days:

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**Docket No. 2021-0727-AIR-E**

- i. Implement measures designed to ensure that all instances of deviations are reported in a timely manner; and
  - ii. Implement measures designed to ensure that the initial notifications for reportable emissions events are submitted in a timely manner.
- b. Within 45 days, submit written certification to demonstrate compliance with a.

***Contact Information***

**TCEQ Attorney:** N/A

**TCEQ Enforcement Coordinator:** Yuliya Dunaway, Enforcement Division, Enforcement Team 2, MC R-13, (210) 403-4077; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548

**Respondent:** Dwayne Burks, Vice President of Operations, Targa Frio LaSalle Pipeline LP f/k/a Frio LaSalle Pipeline, LP, 110 West 7th Street, Suite 2300, Tulsa, Oklahoma 74119-1031

**Respondent's Attorney:** N/A



# Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

<b>DATES</b>	<b>Assigned</b>	1-Jun-2021		
	<b>PCW</b>	10-Jun-2024	<b>Screening</b>	2-Jun-2021
			<b>EPA Due</b>	

<b>RESPONDENT/FACILITY INFORMATION</b>				
<b>Respondent</b>	Targa Frio LaSalle Pipeline LP f/k/a Frio LaSalle Pipeline, LP			
<b>Reg. Ent. Ref. No.</b>	RN106040488			
<b>Facility/Site Region</b>	13-San Antonio	<b>Major/Minor Source</b>	Major	

<b>CASE INFORMATION</b>				
<b>Enf./Case ID No.</b>	60832	<b>No. of Violations</b>	8	
<b>Docket No.</b>	2021-0727-AIR-E	<b>Order Type</b>	1660	
<b>Media Program(s)</b>	Air	<b>Government/Non-Profit</b>	No	
<b>Multi-Media</b>		<b>Enf. Coordinator</b>	Yuliya Dunaway	
		<b>EC's Team</b>	Enforcement Team 2	
<b>Admin. Penalty \$</b>	<b>Limit Minimum</b>	\$0	<b>Maximum</b>	\$25,000

## Penalty Calculation Section

<b>TOTAL BASE PENALTY (Sum of violation base penalties)</b>	<b>Subtotal 1</b>	\$42,750
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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.

<b>Compliance History</b>	63.0%	Adjustment	<b>Subtotals 2, 3, &amp; 7</b>	\$26,932
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Notes	Enhancement for two orders containing a denial of liability, one NOV with dissimilar violations, and Repeat Violator rating. Reduction for two notices of intent to conduct an audit and one disclosure of violations.
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<b>Culpability</b>	No	0.0%	Enhancement	<b>Subtotal 4</b>	\$0
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Notes	The Respondent does not meet the culpability criteria.
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<b>Good Faith Effort to Comply Total Adjustments</b>	<b>Subtotal 5</b>	-\$1,250
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<b>Economic Benefit</b>	0.0%	Enhancement*	<b>Subtotal 6</b>	\$0
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Total EB Amounts	\$2,909
Estimated Cost of Compliance	\$29,750

\*Capped at the Total EB \$ Amount

<b>SUM OF SUBTOTALS 1-7</b>	<b>Final Subtotal</b>	\$68,432
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<b>OTHER FACTORS AS JUSTICE MAY REQUIRE</b>	2.4%	Adjustment	\$1,672
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes	Recommended enhancement to capture the avoided costs of compliance associated with Violation Nos. 1 through 6.
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<b>Final Penalty Amount</b>	\$70,104
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<b>STATUTORY LIMIT ADJUSTMENT</b>	<b>Final Assessed Penalty</b>	\$70,104
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<b>DEFERRAL</b>	0.0%	Reduction	Adjustment	\$0
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Reduces the Final Assessed Penalty by the indicated percentage.

Notes	No deferral for orders in which the Respondent has two or more prior administrative penalty orders as set out in Tex. Water Code § 7.105(b)(2), (b)(4), and (b)(6).
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<b>PAYABLE PENALTY</b>	\$70,104
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Screening Date 2-Jun-2021

Docket No. 2021-0727-AIR-E

PCW

Respondent Targa Frio LaSalle Pipeline LP f/k/a Frio LaSalle Pipeline, LP

Policy Revision 5 (January 28, 2021)

Case ID No. 60832

PCW Revision February 11, 2021

Reg. Ent. Reference No. RN106040488

Media Air

Enf. Coordinator Yuliya Dunaway

## Compliance History Worksheet

## &gt;&gt; Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action ( <i>number of NOVs meeting criteria</i> )	0	0%
	Other written NOVs	1	2%
Orders	Any agreed final enforcement orders containing a denial of liability ( <i>number of orders meeting criteria</i> )	2	40%
	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 ( <i>number of judgments or consent decrees meeting criteria</i> )	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 ( <i>number of counts</i> )	0	0%
Emissions	Chronic excessive emissions events ( <i>number of events</i> )	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 ( <i>number of audits for which notices were submitted</i> )	2	-2%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 ( <i>number of audits for which violations were disclosed</i> )	1	-2%
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) 38%

## &gt;&gt; Repeat Violator (Subtotal 3)

Yes

Adjustment Percentage (Subtotal 3) 25%

## &gt;&gt; Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7) 0%

## &gt;&gt; Compliance History Summary

Compliance History Notes

Enhancement for two orders containing a denial of liability, one NOV with dissimilar violations, and Repeat Violator rating. Reduction for two notices of intent to conduct an audit and one disclosure of violations.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, &amp; 7) 63%

## &gt;&gt; Final Compliance History Adjustment

Final Adjustment Percentage \*capped at 100% 63%

Screening Date

2-Jun-2021

Docket No.

2021-0727-AIR-E

PCW

Respondent

Targa Frio LaSalle Pipeline LP f/k/a Frio LaSalle Pipeline, LP

Policy Revision 5 (January 28, 2021)

Case ID No.

60832

PCW Revision February 11, 2021

Reg. Ent. Reference No.

RN106040488

Media

Air

Enf. Coordinator

Yuliya Dunaway

Violation Number

1

Rule Cite(s)

30 Tex. Admin. Code §§ 122.143(4) and 122.145(2)(B) and (C), Federal Operating Permit ("FOP") No. O3419/General Operating Permit ("GOP") No. 514, Terms and Conditions No. (b)(2), and Tex. Health & Safety Code § 382.085(b)

Violation Description

Failed to submit a deviation report for at least each six-month period after permit issuance and failed to submit the deviation report no later than 30 days after the end of each reporting period. Specifically, the Respondent determined that no deviations occurred and did not submit a deviation report for the May 20, 2017 through November 19, 2017 reporting period, but a deviation report should have been submitted by December 19, 2017 to report the deviations for failing to report the 117 non-reportable emissions events that occurred from May 21, 2017 to November 18, 2017.

Base Penalty

\$25,000

>> Environmental, Property and Human Health Matrix

OR

Release

Major

Harm

Moderate

Minor

Actual

Potential

Percent

0.0%

>>Programmatic Matrix

Falsification

Major

Moderate

Minor

x

Percent

20.0%

Matrix Notes

100% of the rule requirements were not met.

Adjustment

\$20,000

\$5,000

Violation Events

Number of Violation Events

1

1261

Number of violation days

daily

weekly

monthly

quarterly

semiannual

annual

single event

x

Violation Base Penalty

\$5,000

One single event is recommended.

Good Faith Efforts to Comply

0.0%

Reduction

\$0

Before NOE/NOV

NOE/NOV to EDPRP/Settlement Offer

Extraordinary

Ordinary

N/A

x

Notes

The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal

\$5,000

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount

\$836

Violation Final Penalty Total

\$8,349

This violation Final Assessed Penalty (adjusted for limits)

\$8,349

# Economic Benefit Worksheet

**Respondent** Targa Frio LaSalle Pipeline LP f/k/a Frio LaSalle Pipeline, LP  
**Case ID No.** 60832  
**Reg. Ent. Reference No.** RN106040488  
**Media** Air  
**Violation No.** 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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## Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	\$1,500	19-Dec-2017	1-Mar-2025	7.20	\$540	n/a	\$540
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	Estimated cost to implement measures designed to ensure that all instances of deviations are reported in a timely manner. The Date Required is the date the deviation report was due and the Final Date is the estimated date of compliance.						

## Avoided Costs

### ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)	\$250	19-Dec-2017	2-Jun-2021	3.45	\$46	\$250	\$296
Notes for AVOIDED costs	Estimated avoided cost to submit the deviation report for the May 20, 2017 through November 19, 2017 reporting period to report the deviations for failing to report the 117 non-reportable emissions events that occurred from May 21, 2017 to November 18, 2017. The Date Required is the date the deviation report was due and the Final Date is the screening date for Investigation No. 1697975.						

Approx. Cost of Compliance	\$1,750	<b>TOTAL</b>	\$836
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<b>Screening Date</b>	2-Jun-2021	<b>Docket No.</b>	2021-0727-AIR-E	<b>PCW</b>
<b>Respondent</b>	Targa Frio LaSalle Pipeline LP f/k/a Frio LaSalle Pipeline, LP			<i>Policy Revision 5 (January 28, 2021)</i>
<b>Case ID No.</b>	60832			<i>PCW Revision February 11, 2021</i>
<b>Reg. Ent. Reference No.</b>	RN106040488			
<b>Media</b>	Air			
<b>Enf. Coordinator</b>	Yuliya Dunaway			
<b>Violation Number</b>	2			
<b>Rule Cite(s)</b>	30 Tex. Admin. Code §§ 122.143(4) and 122.145(2)(B) and (C), FOP No. O3419/GOP No. 514, Terms and Conditions No. (b)(2), and Tex. Health & Safety Code § 382.085(b)			
<b>Violation Description</b>	Failed to submit a deviation report for at least each six-month period after permit issuance and failed to submit the deviation report no later than 30 days after the end of each reporting period. Specifically, the Respondent determined that no deviations occurred and did not submit a deviation report for the November 20, 2017 through May 19, 2018 reporting period, but a deviation report should have been submitted by June 18, 2018 to report the deviations for failing to report the 126 non-reportable emissions events that occurred from November 23, 2017 to May 19, 2018.			
		<b>Base Penalty</b>	\$25,000	
<b>&gt;&gt; Environmental, Property and Human Health Matrix</b>				
<b>OR</b>	<b>Release</b>	<b>Harm</b>		
		Major	Moderate	Minor
	Actual			
	Potential			
				<b>Percent</b> 0.0%
<b>&gt;&gt; Programmatic Matrix</b>				
	Falsification	Major	Moderate	Minor
		x		
				<b>Percent</b> 20.0%
<b>Matrix Notes</b>	100% of the rule requirements were not met.			
		<b>Adjustment</b>	\$20,000	
			\$5,000	
<b>Violation Events</b>				
	Number of Violation Events	1	1080	Number of violation days
	daily			
	weekly			
	monthly			
	quarterly			
	semiannual			
	annual			
	single event	x		
				<b>Violation Base Penalty</b> \$5,000
	One single event is recommended.			
<b>Good Faith Efforts to Comply</b>	0.0%		<b>Reduction</b>	\$0
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer		
	Extraordinary			
	Ordinary			
	N/A	x		
<b>Notes</b>	The Respondent does not meet the good faith criteria for this violation.			
		<b>Violation Subtotal</b>	\$5,000	
<b>Economic Benefit (EB) for this violation</b>				
	<b>Estimated EB Amount</b>	\$289	<b>Violation Final Penalty Total</b>	\$8,349
	<b>This violation Final Assessed Penalty (adjusted for limits)</b>			\$8,349

# Economic Benefit Worksheet

**Respondent** Targa Frio LaSalle Pipeline LP f/k/a Frio LaSalle Pipeline, LP  
**Case ID No.** 60832  
**Reg. Ent. Reference No.** RN106040488  
**Media** Air  
**Violation No.** 2

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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## Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	See the Economic Benefit in Violation No. 1 for the delayed cost to implement measures designed to ensure that all instances of deviations are reported in a timely manner.						

## Avoided Costs

### ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)	\$250	18-Jun-2018	2-Jun-2021	2.96	\$39	\$250	\$289
Notes for AVOIDED costs	Estimated avoided cost to submit the deviation report for the November 20, 2017 through May 19, 2018 reporting period to report the deviations for failing to report the 126 non-reportable emissions events that occurred from November 23, 2017 to May 19, 2018. The Date Required is the date the deviation report was due and the Final Date is the screening date for Investigation No. 1697975.						

Approx. Cost of Compliance	\$250	TOTAL	\$289
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<b>Screening Date</b>	2-Jun-2021	<b>Docket No.</b>	2021-0727-AIR-E	<b>PCW</b>
<b>Respondent</b>	Targa Frio LaSalle Pipeline LP f/k/a Frio LaSalle Pipeline, LP			<i>Policy Revision 5 (January 28, 2021)</i>
<b>Case ID No.</b>	60832			<i>PCW Revision February 11, 2021</i>
<b>Reg. Ent. Reference No.</b>	RN106040488			
<b>Media</b>	Air			
<b>Enf. Coordinator</b>	Yuliya Dunaway			
<b>Violation Number</b>	3			
<b>Rule Cite(s)</b>	30 Tex. Admin. Code §§ 122.143(4) and 122.145(2)(A), FOP No. 03419/GOP No. 514, Terms and Conditions No. (b)(2), and Tex. Health & Safety Code § 382.085(b)			
<b>Violation Description</b>	Failed to report all instances of deviations. Specifically, the deviation report for the May 20, 2018 through November 19, 2018 reporting period did not include the deviations for failing to report the 169 non-reportable emissions events that occurred from May 20, 2018 to November 14, 2018.			
		<b>Base Penalty</b>	\$25,000	

>> Environmental, Property and Human Health Matrix

OR

		<b>Harm</b>		
<b>Release</b>	Major	Moderate	Minor	
Actual				
Potential				

Percent 0.0%

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	
		x			

Percent 20.0%

Matrix Notes

More than 70% of the rule requirements were not met.

Adjustment \$20,000

\$5,000

Violation Events

Number of Violation Events 1

896

Number of violation days

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty \$5,000

One single event is recommended.

Good Faith Efforts to Comply

0.0%

Reduction \$0

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		
N/A	x	

Notes

The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal \$5,000

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$282

Violation Final Penalty Total \$8,349

This violation Final Assessed Penalty (adjusted for limits) \$8,349

# Economic Benefit Worksheet

**Respondent** Targa Frio LaSalle Pipeline LP f/k/a Frio LaSalle Pipeline, LP  
**Case ID No.** 60832  
**Reg. Ent. Reference No.** RN106040488  
**Media** Air  
**Violation No.** 3

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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## Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	See the Economic Benefit in Violation No. 1 for the delayed cost to implement measures designed to ensure that all instances of deviations are reported in a timely manner.						

## Avoided Costs

### ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)	\$250	19-Dec-2018	2-Jun-2021	2.45	\$32	\$250	\$282
Notes for AVOIDED costs	Estimated avoided cost to submit a revised deviation report for the May 20, 2018 through November 19, 2018 reporting period that includes the deviations for failing to report the 169 non-reportable emissions events that occurred from May 20, 2018 to November 14, 2018. The Date Required is the date the deviations should have been reported and the Final Date is the screening date for Investigation No. 1697975.						

Approx. Cost of Compliance	\$250	TOTAL	\$282
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<b>Screening Date</b>	2-Jun-2021	<b>Docket No.</b>	2021-0727-AIR-E	<b>PCW</b>
<b>Respondent</b>	Targa Frio LaSalle Pipeline LP f/k/a Frio LaSalle Pipeline, LP			<i>Policy Revision 5 (January 28, 2021)</i>
<b>Case ID No.</b>	60832			<i>PCW Revision February 11, 2021</i>
<b>Reg. Ent. Reference No.</b>	RN106040488			
<b>Media</b>	Air			
<b>Enf. Coordinator</b>	Yuliya Dunaway			
<b>Violation Number</b>	4			
<b>Rule Cite(s)</b>	30 Tex. Admin. Code §§ 122.143(4) and 122.145(2)(B) and (C), FOP No. O3419/GOP No. 514, Terms and Conditions No. (b)(2), and Tex. Health & Safety Code § 382.085(b)			
<b>Violation Description</b>	Failed to submit a deviation report for at least each six-month period after permit issuance and failed to submit the deviation report no later than 30 days after the end of each reporting period. Specifically, the Respondent determined that no deviations occurred and did not submit a deviation report for the November 20, 2018 through May 19, 2019 reporting period, but a deviation report should have been submitted by June 18, 2019 to report the deviations for failing to report the 204 non-reportable emissions events that occurred from November 20, 2018 to May 19, 2019.			
		<b>Base Penalty</b>	\$25,000	
<b>&gt;&gt; Environmental, Property and Human Health Matrix</b>				
<b>OR</b>	<b>Release</b>	<b>Harm</b>		
		Major Moderate Minor		
	Actual Potential			<b>Percent</b> 0.0%
<b>&gt;&gt; Programmatic Matrix</b>				
	Falsification	Major Moderate Minor		
		x		<b>Percent</b> 20.0%
<b>Matrix Notes</b>	100% of the rule requirements were not met.			
		<b>Adjustment</b>	\$20,000	
			\$5,000	
<b>Violation Events</b>				
	Number of Violation Events	1	715	Number of violation days
	daily weekly monthly quarterly semiannual annual single event			
				<b>Violation Base Penalty</b> \$5,000
	One single event is recommended.			
<b>Good Faith Efforts to Comply</b>		0.0%	<b>Reduction</b>	\$0
	Extraordinary Ordinary N/A	Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer		
		x		
<b>Notes</b>	The Respondent does not meet the good faith criteria for this violation.			
		<b>Violation Subtotal</b>	\$5,000	
<b>Economic Benefit (EB) for this violation</b>		<b>Statutory Limit Test</b>		
	<b>Estimated EB Amount</b>	\$275	<b>Violation Final Penalty Total</b>	\$8,349
	<b>This violation Final Assessed Penalty (adjusted for limits)</b>			\$8,349

# Economic Benefit Worksheet

**Respondent** Targa Frio LaSalle Pipeline LP f/k/a Frio LaSalle Pipeline, LP  
**Case ID No.** 60832  
**Reg. Ent. Reference No.** RN106040488  
**Media** Air  
**Violation No.** 4

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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## Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	See the Economic Benefit in Violation No. 1 for the delayed cost to implement measures designed to ensure that all instances of deviations are reported in a timely manner.						

## Avoided Costs

### ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)	\$250	18-Jun-2019	2-Jun-2021	1.96	\$25	\$250	\$275
Notes for AVOIDED costs	Estimated avoided cost to submit the deviation report for the November 20, 2018 through May 19, 2019 reporting period to report the deviations for failing to report the 204 non-reportable emissions events that occurred from November 20, 2018 to May 19, 2019. The Date Required is the date the deviation report was due and the Final Date is the screening date for Investigation No. 1697975.						

Approx. Cost of Compliance	\$250	TOTAL	\$275
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<b>Screening Date</b>	2-Jun-2021	<b>Docket No.</b>	2021-0727-AIR-E	<b>PCW</b>
<b>Respondent</b>	Targa Frio LaSalle Pipeline LP f/k/a Frio LaSalle Pipeline, LP			<i>Policy Revision 5 (January 28, 2021)</i>
<b>Case ID No.</b>	60832			<i>PCW Revision February 11, 2021</i>
<b>Reg. Ent. Reference No.</b>	RN106040488			
<b>Media</b>	Air			
<b>Enf. Coordinator</b>	Yuliya Dunaway			
<b>Violation Number</b>	5			
<b>Rule Cite(s)</b>	30 Tex. Admin. Code §§ 122.143(4) and 122.145(2)(A), FOP No. 03419/GOP No. 514, Terms and Conditions No. (b)(2), and Tex. Health & Safety Code § 382.085(b)			
<b>Violation Description</b>	Failed to report all instances of deviations. Specifically, the deviation report for the May 20, 2019 through November 19, 2019 reporting period did not include the deviations for failing to report the 146 non-reportable emissions events that occurred from May 21, 2019 to November 17, 2019.			
		<b>Base Penalty</b>	\$25,000	
<b>&gt;&gt; Environmental, Property and Human Health Matrix</b>				
<b>OR</b>	<b>Release</b>	<b>Harm</b>		
		Major	Moderate	Minor
	Actual			
	Potential			
				<b>Percent</b> 0.0%
<b>&gt;&gt; Programmatic Matrix</b>				
	<b>Falsification</b>	Major	Moderate	Minor
		x		
				<b>Percent</b> 20.0%
<b>Matrix Notes</b>	More than 70% of the rule requirements were not met.			
		<b>Adjustment</b>	\$20,000	
			\$5,000	
<b>Violation Events</b>				
	<b>Number of Violation Events</b>	1	531	<b>Number of violation days</b>
	daily			
	weekly			
	monthly			
	quarterly			
	semiannual			
	annual			
	single event	x		
				<b>Violation Base Penalty</b> \$5,000
	One single event is recommended.			
<b>Good Faith Efforts to Comply</b>		0.0%	<b>Reduction</b>	\$0
		Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	
	Extraordinary			
	Ordinary			
	N/A	x		
<b>Notes</b>	The Respondent does not meet the good faith criteria for this violation.			
		<b>Violation Subtotal</b>	\$5,000	
<b>Economic Benefit (EB) for this violation</b>		<b>Statutory Limit Test</b>		
	<b>Estimated EB Amount</b>	\$268	<b>Violation Final Penalty Total</b>	\$8,349
	<b>This violation Final Assessed Penalty (adjusted for limits)</b>			\$8,349

# Economic Benefit Worksheet

**Respondent** Targa Frio LaSalle Pipeline LP f/k/a Frio LaSalle Pipeline, LP  
**Case ID No.** 60832  
**Reg. Ent. Reference No.** RN106040488  
**Media** Air  
**Violation No.** 5

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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## Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

See the Economic Benefit in Violation No. 1 for the delayed cost to implement measures designed to ensure that all instances of deviations are reported in a timely manner.

## Avoided Costs

### ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)	\$250	19-Dec-2019	2-Jun-2021	1.45	\$18	\$250	\$268

Notes for AVOIDED costs

Estimated avoided cost to submit a revised deviation report for the May 20, 2019 through November 19, 2019 reporting period that includes the deviations for failing to report the 146 non-reportable emissions events that occurred from May 21, 2019 to November 17, 2019. The Date Required is the date the deviations should have been reported and the Final Date is the screening date for Investigation No. 1697975.

Approx. Cost of Compliance \$250

**TOTAL** \$268



<b>Screening Date</b>	2-Jun-2021	<b>Docket No.</b>	2021-0727-AIR-E	<b>PCW</b>	
<b>Respondent</b>	Targa Frio LaSalle Pipeline LP f/k/a Frio LaSalle Pipeline, LP			<i>Policy Revision 5 (January 28, 2021)</i>	
<b>Case ID No.</b>	60832			<i>PCW Revision February 11, 2021</i>	
<b>Reg. Ent. Reference No.</b>	RN106040488				
<b>Media</b>	Air				
<b>Enf. Coordinator</b>	Yuliya Dunaway				
<b>Violation Number</b>	6				
<b>Rule Cite(s)</b>	30 Tex. Admin. Code §§ 122.143(4) and 122.145(2)(A), FOP No. 03419/GOP No. 514, Terms and Conditions No. (b)(2), and Tex. Health & Safety Code § 382.085(b)				
<b>Violation Description</b>	Failed to report all instances of deviations. Specifically, the deviation report for the November 20, 2019 through May 19, 2020 reporting period did not include the deviations for failing to report the 87 non-reportable emissions events that occurred from November 21, 2019 to May 17, 2020.				
		<b>Base Penalty</b>	\$25,000		
<b>&gt;&gt; Environmental, Property and Human Health Matrix</b>					
<b>OR</b>	<b>Release</b>	Major	Moderate	Minor	
	Actual				<b>Percent</b> 0.0%
	Potential				
<b>&gt;&gt; Programmatic Matrix</b>					
	Falsification	Major	Moderate	Minor	
		x			<b>Percent</b> 20.0%
<b>Matrix Notes</b>	More than 70% of the rule requirements were not met.				
		<b>Adjustment</b>	\$20,000		
			\$5,000		
<b>Violation Events</b>					
	Number of Violation Events	1	349	Number of violation days	
	daily				
	weekly				
	monthly				
	quarterly				
	semiannual				
	annual				
	single event	x			
	<b>Violation Base Penalty</b>	\$5,000			
	One single event is recommended.				
<b>Good Faith Efforts to Comply</b>		0.0%	<b>Reduction</b>	\$0	
	Extraordinary		Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	
	Ordinary				
	N/A	x			
<b>Notes</b>	The Respondent does not meet the good faith criteria for this violation.				
	<b>Violation Subtotal</b>	\$5,000			
<b>Economic Benefit (EB) for this violation</b>		<b>Statutory Limit Test</b>			
	<b>Estimated EB Amount</b>	\$262	<b>Violation Final Penalty Total</b>	\$8,349	
	<b>This violation Final Assessed Penalty (adjusted for limits)</b>			\$8,349	

# Economic Benefit Worksheet

**Respondent** Targa Frio LaSalle Pipeline LP f/k/a Frio LaSalle Pipeline, LP  
**Case ID No.** 60832  
**Reg. Ent. Reference No.** RN106040488  
**Media** Air  
**Violation No.** 6

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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## Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	See the Economic Benefit in Violation No. 1 for the delayed cost to implement measures designed to ensure that all instances of deviations are reported in a timely manner.						

## Avoided Costs

### ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)	\$250	18-Jun-2020	2-Jun-2021	0.96	\$12	\$250	\$262
Notes for AVOIDED costs	Estimated avoided cost to submit a revised deviation report for the November 20, 2019 through May 19, 2020 reporting period that includes the deviations for failing to report the 87 non-reportable emissions events that occurred from November 21, 2019 to May 17, 2020. The Date Required is the date the deviations should have been reported and the Final Date is the screening date for Investigation No. 1697975.						

Approx. Cost of Compliance	\$250	TOTAL	\$262
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<b>Screening Date</b>	2-Jun-2021	<b>Docket No.</b>	2021-0727-AIR-E	<b>PCW</b>
<b>Respondent</b>	Targa Frio LaSalle Pipeline LP f/k/a Frio LaSalle Pipeline, LP			<i>Policy Revision 5 (January 28, 2021)</i>
<b>Case ID No.</b>	60832			<i>PCW Revision February 11, 2021</i>
<b>Reg. Ent. Reference No.</b>	RN106040488			
<b>Media</b>	Air			
<b>Enf. Coordinator</b>	Yuliya Dunaway			
<b>Violation Number</b>	7			
<b>Rule Cite(s)</b>	30 Tex. Admin. Code §§ 101.201(a)(1)(B) and 122.143(4), FOP No. 03419/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(40)(F), and Tex. Health & Safety Code § 382.085(b)			
<b>Violation Description</b>	Failed to submit an initial notification for a reportable emissions event no later than 24 hours after the discovery of an emissions event. Specifically, the initial notification for Incident No. 366898 was due by September 19, 2021 at 12:00 a.m., but was not submitted until September 20, 2021 at 4:08 p.m.			
		<b>Base Penalty</b>	\$25,000	
<b>&gt;&gt; Environmental, Property and Human Health Matrix</b>				
<b>OR</b>	<b>Release</b>	<b>Harm</b>		
		Major	Moderate	Minor
	Actual			
	Potential			
				<b>Percent</b> 0.0%
<b>&gt;&gt; Programmatic Matrix</b>				
	Falsification	Major	Moderate	Minor
				x
				<b>Percent</b> 1.0%
<b>Matrix Notes</b>	Less than 30% of the rule requirements were not met.			
		<b>Adjustment</b>	\$24,750	
			\$250	
<b>Violation Events</b>				
	Number of Violation Events	1	1	Number of violation days
	daily			
	weekly			
	monthly			
	quarterly			
	semiannual			
	annual			
	single event	x		
			<b>Violation Base Penalty</b>	\$250
	One single event is recommended.			
<b>Good Faith Efforts to Comply</b>	0.0%		<b>Reduction</b>	\$0
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer		
	Extraordinary			
	Ordinary			
	N/A	x		
<b>Notes</b>	The Respondent does not meet the good faith criteria for this violation.			
		<b>Violation Subtotal</b>	\$250	
<b>Economic Benefit (EB) for this violation</b>				
	<b>Estimated EB Amount</b>	\$259	<b>Violation Final Penalty Total</b>	\$417
	<b>This violation Final Assessed Penalty (adjusted for limits)</b>			\$417

# Economic Benefit Worksheet

Respondent

Case ID No.

Reg. Ent. Reference No.

Media

Violation No.

Targa Frio LaSalle Pipeline LP f/k/a Frio LaSalle Pipeline, LP

60832

RN106040488

Air

7

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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## Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling	\$1,500	19-Sep-2021	1-Mar-2025	3.45	\$259	n/a	\$259
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$250	19-Sep-2021	20-Sep-2021	0.00	\$0	n/a	\$0
Notes for DELAYED costs	Estimated costs to submit the initial notification for Incident No. 366898 (\$250) and to implement measures designed to ensure that the initial notifications for reportable emissions events are submitted in a timely manner (\$1,500). The Dates Required are the date the initial notification was due and the Final Dates are the date the initial notification was submitted and the estimated date of compliance.						

## Avoided Costs

### ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							

Approx. Cost of Compliance	\$1,750	TOTAL	\$259
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<b>Screening Date</b>	2-Jun-2021	<b>Docket No.</b>	2021-0727-AIR-E	<b>PCW</b>
<b>Respondent</b>	Targa Frio LaSalle Pipeline LP f/k/a Frio LaSalle Pipeline, LP			<i>Policy Revision 5 (January 28, 2021)</i>
<b>Case ID No.</b>	60832			<i>PCW Revision February 11, 2021</i>
<b>Reg. Ent. Reference No.</b>	RN106040488			
<b>Media</b>	Air			
<b>Enf. Coordinator</b>	Yuliya Dunaway			
<b>Violation Number</b>	8			
<b>Rule Cite(s)</b>	30 Tex. Admin. Code §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration Number 94152, FOP No. 03419/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and Tex. Health & Safety Code § 382.085(b)			
<b>Violation Description</b>	Failed to prevent unauthorized emissions. Specifically, the Respondent released 1,045.45 pounds ("lbs") of nitrogen oxides, 4,221.66 lbs of sulfur dioxide, 2,087.10 lbs of carbon monoxide, and 44.90 lbs of hydrogen sulfide from the Maintenance Flare, Emissions Point Number MFLARE, during an emissions event (Incident No. 366898) that began on September 18, 2021 and lasted 59 hours and 16 minutes.			
		<b>Base Penalty</b>	\$25,000	

>> Environmental, Property and Human Health Matrix

OR

		<b>Release</b>		<b>Harm</b>	
			Major	Moderate	Minor
	Actual			x	
	Potential				

Percent 50.0%

>>Programmatic Matrix

		Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes

Human health or the environment has been exposed to significant amounts of pollutants which do not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$12,500

\$12,500

Violation Events

Number of Violation Events 1

3

Number of violation days

	daily	
	weekly	
	monthly	x
	quarterly	
	semiannual	
	annual	
	single event	

Violation Base Penalty \$12,500

One monthly event is recommended.

Good Faith Efforts to Comply

10.0%

Reduction \$1,250

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		x
N/A		

Notes

The Respondent completed the corrective actions by January 24, 2022, after the Notice of Enforcement dated January 4, 2022.

Violation Subtotal \$11,250

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$438

Violation Final Penalty Total \$19,592

This violation Final Assessed Penalty (adjusted for limits) \$19,592

Economic Benefit Worksheet

Respondent Case ID No. Reg. Ent. Reference No. Media Violation No. Targa Frio LaSalle Pipeline LP f/k/a Frio LaSalle Pipeline, LP 60832 RN106040488 Air 8

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$25,000	18-Sep-2021	24-Jan-2022	0.35	\$438	n/a	\$438

Notes for DELAYED costs

Estimated cost to communicate with the producer customers the importance of gas quality being injected into the gathering lines and the consequences if certain quality parameters are exceeded, install multiple oxygen sensors and alarms within the facility and pipelines, install automatic shut-off valves on inlet gathering pipelines that will close when the oxygen levels rise above the set-point, and update operating procedures and training to include measures to be taken in the event of high oxygen levels in the inlet piping or at the Site in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 366898. The Date Required is the date the emissions event began and the Final Date is the date of compliance.

Avoided Costs

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

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance	\$25,000	TOTAL	\$438
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# Compliance History Report

Compliance History Report for CN604671388, RN106040488, Rating Year 2023 which includes Compliance History (CH) components from September 1, 2018, through August 31, 2023.

**Customer, Respondent, or Owner/Operator:** CN604671388, Targa Frio LaSalle Pipeline LP f/k/a Frio LaSalle Pipeline LP  
**Classification:** SATISFACTORY **Rating:** 14.09

**Regulated Entity:** RN106040488, LANCASTER RANCH COMPRESSOR STATION AND TREATING FACILITY  
**Classification:** UNSATISFACTORY **Rating:** 75.78

**Complexity Points:** 7  
**Repeat Violator:** YES

**CH Group:** 03 - Oil and Gas Extraction

**Location:** Approximately 2,450 feet northeast of the intersection of Farm-to-Market Road 1583 and Highway 85 near Dilley, Frio County, Texas

**TCEQ Region:** REGION 13 - SAN ANTONIO

**ID Number(s):**  
**AIR OPERATING PERMITS** PERMIT 3419  
**AIR NEW SOURCE PERMITS** REGISTRATION 165351  
**AIR NEW SOURCE PERMITS** AFS NUM 4816300011  
**AIR NEW SOURCE PERMITS** REGISTRATION 94152  
**AIR NEW SOURCE PERMITS** REGISTRATION 173048  
**AIR EMISSIONS INVENTORY** ACCOUNT NUMBER FJA003C

**Compliance History Period:** September 01, 2018 to August 31, 2023 **Rating Year:** 2023 **Rating Date:** 09/01/2023

**Date Compliance History Report Prepared:** April 01, 2024

**Agency Decision Requiring Compliance History:** Enforcement

**Component Period Selected:** April 01, 2019 to April 01, 2024

**TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.**  
**Name:** Yuliya Dunaway **Phone:** (210) 403-4077

## Site and Owner/Operator History:

- 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/operator of the site during the compliance period? NO

## Components (Multimedia) for the Site Are Listed in Sections A - J

### **A. Final Orders, court judgments, and consent decrees:**

- 1 Effective Date: 04/28/2020 ADMINORDER 2019-1397-AIR-E (1660 Order-Agreed Order With Denial)
- Classification: Moderate
- Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)  
30 TAC Chapter 122, SubChapter B 122.143(4)  
5C THSC Chapter 382 382.085(b)
- Rqmt Prov: FOP No. 03419 OP
- Description: Failure to report a reportable emissions event within the required timeframe. (Category C3)
- Classification: Major
- Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)  
30 TAC Chapter 116, SubChapter F 116.615(2)  
30 TAC Chapter 122, SubChapter B 122.143(4)  
5C THSC Chapter 382 382.085(b)
- Rqmt Prov: FOP No. 03419 OP
- Standard Permit Reg. No. 94152 PERMIT
- Description: Failure to maintain emission limits. (Category A12(i)(6))

Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)  
30 TAC Chapter 122, SubChapter B 122.145(2)(C)  
5C THSC Chapter 382 382.085(b)

Rqmt Prov: GOP 514(b)(2) OP

Description: failed to submit a deviation report no later than 30 days after the end of each reporting period. Specifically, the Respondent determined that no deviations occurred during the November 20, 2018 through May 19, 2019 reporting period and did not submit a deviation report for the November 20, 2018 through May 19, 2019 reporting period, but the deviation for Incident No. 302965 that occurred on February 16, 2019 should have been reported by June 18, 2019.

## B. Criminal convictions:

N/A

## C. Chronic excessive emissions events:

N/A

## D. The approval dates of investigations (CCEDS Inv. Track. No.):

Item 1	October 21, 2019	(1603611)
Item 2	January 22, 2021	(1700277)
Item 3	April 18, 2023	(1888041)
Item 4	March 22, 2024	(1956191)

## E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

1	Date:	08/11/2023	(1909975)	
	Self Report?	NO		Classification: Minor
	Citation:	30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.165(a)(8) 30 TAC Chapter 122, SubChapter B 122.165(c) 5C THSC Chapter 382 382.085(b) General Condition: (b)(1) OP		
	Description:	Failure to include a signed certification of accuracy and completeness for the annual compliance certification.		

## F. Environmental audits:

Notice of Intent Date: 04/07/2022 (1810970)  
No DOV Associated

Notice of Intent Date: 05/16/2022 (1818912)

Disclosure Date: 06/02/2022

Viol. Major

Classification:

Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)  
5C THSC Chapter 382 382.085(b)

Description: Failure to authorize emissions prior to construction.

Viol. Moderate

Classification:

Citation: 30 TAC Chapter 122, SubChapter F 122.503(c)(2)

Description: Failure to submit permit revision prior to operation of new emission sources.

Disclosure Date: 12/20/2022

Viol. Moderate

Classification:

Citation: 30 TAC Chapter 106, SubChapter A 106.8  
30 TAC Chapter 116, SubChapter B 116.110(a)

Description: Failure to properly authorize all MSS activities.

Viol. Moderate

Classification:

Citation: 30 TAC Chapter 106, SubChapter W 106.512(2)(C)(i)

Description: Failure to maintain records for all portable analyzer tests.



Viol. Moderate  
 Classification:  
 Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT JJJJ 60.4245(d)  
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.8(d)  
 Description: Failure to submit NSPA JJJJ pre-test notifications for the listed equipment.  
 Viol. Moderate  
 Classification:  
 Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7(a)(1)  
 Description: Failure submit Notice of Construction.  
 Viol. Moderate  
 Classification:  
 Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.7(a)(3)  
 Description: Failure to submit Notice of Startup.  
 Viol. Moderate  
 Classification:  
 Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT JJJJ 60.4243(a)(2)  
 Description: Failure to submit a NSPS JJJJ maintenance plan for the subject RICE engines.  
 Viol. Moderate  
 Classification:  
 Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)  
 Description: Failure to properly authorize/document tanks.  
 Viol. Moderate  
 Classification:  
 Citation: 30 TAC Chapter 122, SubChapter B 122.136(b)  
 Description: Failure to represent the boiler as applicable to NSPS De.  
 Viol. Moderate  
 Classification:  
 Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)  
 Description: Failure to maintain adequate documentation to complete excessive emissions reporting.

**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

TARGA FRIO LASALLE PIPELINE LP  
F/K/A FRIO LASALLE PIPELINE, LP  
RN106040488

§  
§  
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BEFORE THE

TEXAS COMMISSION ON

ENVIRONMENTAL QUALITY

## AGREED ORDER DOCKET NO. 2021-0727-AIR-E

### I. JURISDICTION AND STIPULATIONS

On \_\_\_\_\_, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Targa Frio LaSalle Pipeline LP f/k/a Frio LaSalle Pipeline, LP (the "Respondent") under the authority of TEX. HEALTH & SAFETY CODE ch. 382 and TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent together stipulate that:

1. The Respondent owns and operates a natural gas compressor station located at approximately 2,450 feet northeast of the intersection of Farm-to-Market Road 1583 and Highway 85 near Dilley, Frio County, Texas (the "Site"). The Site consists or consisted of one or more sources as defined in TEX. HEALTH & SAFETY CODE § 382.003(12).
2. The Executive Director and the Respondent agree that the TCEQ has jurisdiction to enter this Order pursuant to TEX. WATER CODE §§ 7.002, 7.051, and 7.073, and that the Respondent is subject to TCEQ's jurisdiction. The TCEQ has jurisdiction in this matter pursuant to TEX. WATER CODE § 5.013 because it alleges violations of TEX. HEALTH & SAFETY CODE ch. 382 and the rules of the TCEQ.
3. The occurrence of any violation is in dispute and the entry of this Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
4. An administrative penalty in the amount of \$70,104 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$70,104 of the penalty.
5. The Executive Director and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 TEX. ADMIN. CODE § 70.10(a). 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.
6. 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 the Respondent has not complied with one or more of the terms or conditions in this Order.

7. This Order represents the complete and fully integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable.
8. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.
9. The Executive Director recognizes that the Respondent implemented the following corrective measures at the Site:
  - a. On September 20, 2021, submitted the initial notification for Incident No. 366898.
  - b. By January 24, 2022, communicated with the producer customers the importance of gas quality being injected into the gathering lines and the consequences if certain quality parameters are exceeded, installed multiple oxygen sensors and alarms within the facility and pipelines, installed automatic shut-off valves on inlet gathering pipelines, and updated operating procedures and training to include measures to be taken in the event of high oxygen levels in the inlet piping or at the Site in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 366898.

## II. ALLEGATIONS

1. During a record review for the Site conducted on March 31, 2021, an investigator documented that the Respondent:
  - a. Failed to submit a deviation report for at least each six-month period after permit issuance and failed to submit the deviation report no later than 30 days after the end of each reporting period, in violation of 30 TEX. ADMIN. CODE §§ 122.143(4) and 122.145(2)(B) and (C), Federal Operating Permit ("FOP") No. O3419/General Operating Permit ("GOP") No. 514, Terms and Conditions No. (b)(2), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent determined that no deviations occurred and did not submit a deviation report for the May 20, 2017 through November 19, 2017 reporting period, but a deviation report should have been submitted by December 19, 2017 to report the deviations for failing to report the 117 non-reportable emissions events that occurred from May 21, 2017 to November 18, 2017.
  - b. Failed to submit a deviation report for at least each six-month period after permit issuance and failed to submit the deviation report no later than 30 days after the end of each reporting period, in violation of 30 TEX. ADMIN. CODE §§ 122.143(4) and 122.145(2)(B) and (C), FOP No. O3419/GOP No. 514, Terms and Conditions No. (b)(2), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent determined that no deviations occurred and did not submit a deviation report for the November 20, 2017 through May 19, 2018 reporting period, but a deviation report should have been submitted by June 18, 2018 to

report the deviations for failing to report the 126 non-reportable emissions events that occurred from November 23, 2017 to May 19, 2018.

- c. Failed to report all instances of deviations, in violation of 30 TEX. ADMIN. CODE §§ 122.143(4) and 122.145(2)(A), FOP No. 03419/GOP No. 514, Terms and Conditions No. (b)(2), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the deviation report for the May 20, 2018 through November 19, 2018 reporting period did not include the deviations for failing to report the 169 non-reportable emissions events that occurred from May 20, 2018 to November 14, 2018.
  - d. Failed to submit a deviation report for at least each six-month period after permit issuance and failed to submit the deviation report no later than 30 days after the end of each reporting period, in violation of 30 TEX. ADMIN. CODE §§ 122.143(4) and 122.145(2)(B) and (C), FOP No. 03419/GOP No. 514, Terms and Conditions No. (b)(2), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent determined that no deviations occurred and did not submit a deviation report for the November 20, 2018 through May 19, 2019 reporting period, but a deviation report should have been submitted by June 18, 2019 to report the deviations for failing to report the 204 non-reportable emissions events that occurred from November 20, 2018 to May 19, 2019.
  - e. Failed to report all instances of deviations, in violation of 30 TEX. ADMIN. CODE §§ 122.143(4) and 122.145(2)(A), FOP No. 03419/GOP No. 514, Terms and Conditions No. (b)(2), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the deviation report for the May 20, 2019 through November 19, 2019 reporting period did not include the deviations for failing to report the 146 non-reportable emissions events that occurred from May 21, 2019 to November 17, 2019.
  - f. Failed to report all instances of deviations, in violation of 30 TEX. ADMIN. CODE §§ 122.143(4) and 122.145(2)(A), FOP No. 03419/GOP No. 514, Terms and Conditions No. (b)(2), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the deviation report for the November 20, 2019 through May 19, 2020 reporting period did not include the deviations for failing to report the 87 non-reportable emissions events that occurred from November 21, 2019 to May 17, 2020.
2. During a record review for the Site conducted on October 19, 2021, an investigator documented that the Respondent:
- a. Failed to submit an initial notification for a reportable emissions event no later than 24 hours after the discovery of an emissions event, in violation of 30 TEX. ADMIN. CODE §§ 101.201(a)(1)(B) and 122.143(4), FOP No. 03419/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(40)(F), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the initial notification for Incident No. 366898 was due by September 19, 2021 at 12:00 a.m., but was not submitted until September 20, 2021 at 4:08 p.m.
  - b. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration Number 94152, FOP No. 03419/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent released 1,045.45 pounds ("lbs") of nitrogen oxides, 4,221.66 lbs of sulfur dioxide, 2,087.10 lbs of carbon monoxide, and 44.90 lbs of hydrogen

sulfide from the Maintenance Flare, Emissions Point Number MFLARE, during an emissions event (Incident No. 366898) that began on September 18, 2021 and lasted 59 hours and 16 minutes.

### **III. DENIALS**

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

### **IV. ORDERING PROVISIONS**

NOW, THEREFORE, THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ORDERS that:

1. The Respondent is assessed a penalty as set forth in Section I, Paragraph No. 4. The payment of this penalty and the Respondent's compliance with all of the requirements set forth in this 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. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: Targa Frio LaSalle Pipeline LP f/k/a Frio LaSalle Pipeline, LP, Docket No. 2021-0727-AIR-E" to:

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

2. The Respondent shall undertake the following technical requirements at the Site:
  - a. Within 30 days after the effective date of the Order:
    - i. Implement measures designed to ensure that all instances of deviations are reported in a timely manner; and
    - ii. Implement measures designed to ensure that the initial notifications for reportable emissions events are submitted in a timely manner.
  - b. Within 45 days after the effective date of this Order, submit written certification, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.a. The certification shall be signed by the Respondent and shall include the following certification language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

The certification shall be submitted to:

Enforcement Division, MC 149A  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

with a copy to:

Air Section Manager  
San Antonio Regional Office  
Texas Commission on Environmental Quality  
14250 Judson Road  
San Antonio, Texas 78233-4480

3. All relief not expressly granted in this Order is denied.
4. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Site operations referenced in this Order.
5. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Enforcement Division at the address listed above.
6. This Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this 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.
7. This Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms: electronic transmission, owner, person, writing, and written, shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.

8. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

**SIGNATURE PAGE**

**TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**

-----  
For the Commission

-----  
Date

-----  
For the Executive Director

-----  
8/5/2024  
-----  
Date

I, the undersigned, have read and understand the attached Order. I am authorized to agree to the attached Order, 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 OAG 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 OAG 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.

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Signature

-----  
Date

Dwayne Burks

-----  
Vice President, Operations

-----  
Name (Printed or typed)

-----  
Title

Authorized Representative of

Targa Frio LaSalle Pipeline LP f/k/a Frio LaSalle Pipeline, LP

☒ If mailing address has changed, please check this box and provide the new address below:

MR DWAYNE BURKS  
VICE PRESIDENT OPERATIONS  
TARGA FRIO LASALLE PIPELINE LP  
110 W 7TH ST STE 2300  
TULSA OK 74119-1031

\*Please see attached GOP Revision documentation noting correct company name, address, and contact.\*

**Instructions:** Send the original, signed Order with penalty payment to the Financial Administration Division, Revenue Operations Section at the address in Ordering Provision 1 of this Order.