

Executive Summary – Enforcement Matter – Case No. 61192
Kinder Morgan Tejas Pipeline LLC
RN100217629
Docket No. 2021-1083-AIR-E

Order Type:

1660 Agreed Order

Findings Order Justification:

N/A

Media:

AIR

Small Business:

No

Location(s) Where Violation(s) Occurred:

Stratton Ridge Storage Facility, located approximately 0.5 mile east of the Farm-to-Market Road 523 and Stratton Ridge Road intersection near Clute, Brazoria County

Type of Operation:

Natural gas compression and storage site

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: January 21, 2022

Comments Received: No

Penalty Information

Total Penalty Assessed: \$28,970

Amount Deferred for Expedited Settlement: \$5,794

Total Paid to General Revenue: \$23,176

Total Due to General Revenue: \$0

Payment Plan: N/A

Compliance History Classifications:

Person/CN - Satisfactory

Site/RN - Satisfactory

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: June 14, 2021 through August 4, 2021

Date(s) of NOE(s): August 12, 2021

Executive Summary – Enforcement Matter – Case No. 61192
Kinder Morgan Tejas Pipeline LLC
RN100217629
Docket No. 2021-1083-AIR-E

Violation Information

Failed to check the engine for proper operation by recorded measurements of nitrogen oxides and carbon monoxide emissions at least quarterly and within two weeks after each occurrence of engine maintenance that may be expected to increase emissions. Specifically, the Respondent did not measure the nitrogen oxides and carbon monoxide emissions from Engines C-1, C-2, and C-3 from the third quarter of 2016 through the fourth quarter of 2020 [30 TEX. ADMIN. CODE §§ 117.8140(b) and 122.143(4), Federal Operating Permit No. O100/General Operating Permit No. 511, Table 23, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

The Respondent completed the following corrective measures:

- a. By implementing an appropriate action item in the Compliance Tracking System to ensure that Engines C-1, C-2, and C-3 are checked for proper operation by recorded measurements of nitrogen oxides ("NOx") and carbon monoxide ("CO") emissions at least quarterly and within two weeks after each occurrence of engine maintenance that may be expected to increase emissions, by January 29, 2021.
- b. By measuring and recording the NOx and CO emissions from Engines C-1, C-2, and C-3, by February 10, 2021.

Technical Requirements:

N/A

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Kate Dacy, Enforcement Division, Enforcement Team 4, MC 219, (512) 239-4593; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548

Respondent: Steven Romano, Vice President of Operations, Kinder Morgan Tejas Pipeline LLC, 1001 Louisiana Street, Houston, Texas 77002

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

DATES	Assigned	16-Aug-2021	Screening	17-Aug-2021	EPA Due	
	PCW	25-Oct-2021				

RESPONDENT/FACILITY INFORMATION

Respondent	Kinder Morgan Tejas Pipeline LLC				
Reg. Ent. Ref. No.	RN100217629				
Facility/Site Region	12-Houston	Major/Minor Source	Major		

CASE INFORMATION

Enf./Case ID No.	61192	No. of Violations	1	
Docket No.	2021-1083-AIR-E	Order Type	1660	
Media Program(s)	Air	Government/Non-Profit	No	
Multi-Media		Enf. Coordinator	Kate Dacy	
		EC's Team	Enforcement Team 4	
Admin. Penalty \$ Limit	Minimum	\$0	Maximum	\$25,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$31,500
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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	1.0% Adjustment	Subtotals 2, 3, & 7	\$315
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Notes: Enhancement for one NOV with dissimilar violations. Reduction for one notice of intent to conduct an audit.

Culpability	No	0.0% Enhancement	Subtotal 4	\$0
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Notes: The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply Total Adjustments	Subtotal 5	-\$7,875
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Economic Benefit	0.0% Enhancement*	Subtotal 6	\$0
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Total EB Amounts	\$5,036
Estimated Cost of Compliance	\$6,503

*Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7	Final Subtotal	\$23,940
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OTHER FACTORS AS JUSTICE MAY REQUIRE	21.0% Adjustment	\$5,030
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes: Enhancement to capture the avoided cost of compliance associated with Violation No. 1.

Final Penalty Amount	\$28,970
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$28,970
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DEFERRAL	20.0% Reduction Adjustment	-\$5,794
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Reduces the Final Assessed Penalty by the indicated percentage.

Notes: Deferral offered for expedited settlement.

PAYABLE PENALTY	\$23,176
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Screening Date 17-Aug-2021

Docket No. 2021-1083-AIR-E

PCW

Respondent Kinder Morgan Tejas Pipeline LLC

Policy Revision 5 (January 28, 2021)

Case ID No. 61192

PCW Revision February 11, 2021

Reg. Ent. Reference No. RN100217629

Media Air

Enf. Coordinator Kate Dacy

Compliance History Worksheet

>> 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>)	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 (<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>)	1	-1%
	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>)	0	0%
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) 1%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

Enhancement for one NOV with dissimilar violations. Reduction for one notice of intent to conduct an audit.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 1%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% 1%

Screening Date 17-Aug-2021 **Docket No.** 2021-1083-AIR-E **PCW**
Respondent Kinder Morgan Tejas Pipeline LLC *Policy Revision 5 (January 28, 2021)*
Case ID No. 61192 *PCW Revision February 11, 2021*
Reg. Ent. Reference No. RN100217629
Media Air
Enf. Coordinator Kate Dacy

Violation Number 1
Rule Cite(s) 30 Tex. Admin. Code §§ 117.8140(b) and 122.143(4), Federal Operating Permit No. O100/General Operating Permit No. 511, Table 23, and Tex. Health & Safety Code § 382.085(b)
Violation Description Failed to check the engine for proper operation by recorded measurements of engine nitrogen oxides ("NOx") and carbon monoxide ("CO") emissions at least quarterly and within two weeks after each occurrence of engine maintenance that may be expected to increase emissions. Specifically, the Respondent did not measure the NOx and CO emissions from Engines C-1, C-2, and C-3 from the third quarter of 2016 through the fourth quarter of 2020.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
	Actual				7.0%
	Potential			x	

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	Percent
					0.0%

Matrix Notes Human health and the environment will or could be exposed to insignificant amounts of pollutants that would not exceed levels that are protective of human health or the environmental receptors as a result of this violation.

Adjustment \$23,250

\$1,750

Violation Events

Number of Violation Events 18 1644 Number of violation days

daily	
weekly	
monthly	
quarterly	x
semiannual	
annual	
single event	

Violation Base Penalty \$31,500

Eighteen single events are recommended (one event for each quarter that was not measured and recorded).

Good Faith Efforts to Comply 25.0% Reduction \$7,875

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

Notes The Respondent completed the corrective actions by February 10, 2021, prior to the Notice of Enforcement dated August 12, 2021

Violation Subtotal \$23,625

Economic Benefit (EB) for this violation **Statutory Limit Test**

Estimated EB Amount \$5,036 **Violation Final Penalty Total** \$28,970

This violation Final Assessed Penalty (adjusted for limits) \$28,970

Economic Benefit Worksheet

Respondent Kinder Morgan Tejas Pipeline LLC
Case ID No. 61192
Reg. Ent. Reference No. RN100217629
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				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)	\$1,500	31-Dec-2020	29-Jan-2021	0.08	\$6	n/a	\$6

Notes for DELAYED costs

Estimated cost to implement an appropriate action item in the Compliance Tracking System to ensure that Engines C-1, C-2, and C-3 are checked for proper operation by recorded measurements of NOx and CO emissions at least quarterly and within two weeks after each occurrence of engine maintenance that may be expected to increase emissions. The Date Required is the last day measurements could have been made for the fourth quarter of 2020 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)	\$5,003	31-Dec-2020	10-Feb-2021	0.11	\$27	\$5,003	\$5,030

Notes for AVOIDED costs

Estimated avoided costs to measure and record the NOx and CO emissions from Engines C-1, C-2, and C-3 at least once during each calendar quarter (18 missed measurements @ \$250/measurement plus \$503 interest that began accruing on the last day of each quarter from the third quarter of 2016 through the third quarter of 2020). The Date Required is the last day measurements could have been made for the fourth quarter of 2020 and the Final Date is the date of compliance.

Approx. Cost of Compliance \$6,503

TOTAL \$5,036

The TCEQ is committed to accessibility.

To request a more accessible version of this report, please contact the TCEQ Help Desk at (512) 239-4357.



Compliance History Report

Compliance History Report for CN603437849, RN100217629, Rating Year 2021 which includes Compliance History (CH) components from September 1, 2016, through August 31, 2021.

Customer, Respondent, or Owner/Operator: CN603437849, Kinder Morgan Tejas Pipeline LLC **Classification:** SATISFACTORY **Rating:** 0.42
Regulated Entity: RN100217629, STRATTON RIDGE STORAGE FACILITY **Classification:** SATISFACTORY **Rating:** 1.17
Complexity Points: 5 **Repeat Violator:** NO
CH Group: 14 - Other
Location: Approximately 0.5 mile east of the Farm-to-Market Road 523 and Stratton Ridge Road intersection near Clute, Brazoria County, Texas
TCEQ Region: REGION 12 - HOUSTON

ID Number(s):

AIR OPERATING PERMITS ACCOUNT NUMBER BL0675H **AIR OPERATING PERMITS** PERMIT 100
AIR NEW SOURCE PERMITS ACCOUNT NUMBER BL0675H **AIR NEW SOURCE PERMITS** AFS NUM 4803900133
AIR NEW SOURCE PERMITS REGISTRATION 163752 **AIR EMISSIONS INVENTORY** ACCOUNT NUMBER BL0675H

Compliance History Period: September 01, 2016 to August 31, 2021 **Rating Year:** 2021 **Rating Date:** 09/01/2021

Date Compliance History Report Prepared: October 25, 2021

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: October 25, 2016 to October 25, 2021

TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.

Name: Kate Dacy

Phone: (512) 239-4593

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:

N/A

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1	June 09, 2017	(1400708)
Item 2	August 01, 2018	(1481865)
Item 3	June 05, 2019	(1556917)
Item 4	July 27, 2020	(1633207)
Item 5	July 30, 2020	(1637728)

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: 08/12/2021 (1724396)

Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 122, SubChapter B 122.143(4)		
	30 TAC Chapter 122, SubChapter B 122.145(2)(A)		
	5C THSC Chapter 382 382.085(b)		
	Term(b)(2) OP		
Description:	Failure to report all instances of deviations. (Category B3)		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 122, SubChapter B 122.143(4)		
	30 TAC Chapter 122, SubChapter B 122.145(2)(A)		
	5C THSC Chapter 382 382.085(b)		
	Term(b)(2) PERMIT		
Description:	Failure to report all instances of deviations. (Category B3)		

F. Environmental audits:

Notice of Intent Date: 08/16/2017 (1436488)

No DOV Associated

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
KINDER MORGAN TEJAS
PIPELINE LLC
RN100217629**

**§
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§
§
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§**

**BEFORE THE

TEXAS COMMISSION ON

ENVIRONMENTAL QUALITY**

**AGREED ORDER
DOCKET NO. 2021-1083-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 Kinder Morgan Tejas Pipeline LLC (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 compression and storage site located approximately 0.5 mile east of the Farm-to-Market Road 523 and Stratton Ridge Road intersection near Clute, Brazoria 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 \$28,970 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$23,176 of the penalty and \$5,794 is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Order. The deferred amount shall be waived only upon full compliance with all the terms and conditions contained in this Order. If the Respondent fails to timely and satisfactorily comply with any of the terms or requirements contained in this Order, the Executive Director may demand payment of all or part of the deferred penalty amount.

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 completed the following corrective measures at the Site:
 - a. By implementing an appropriate action item in the Compliance Tracking System to ensure that Engines C-1, C-2, and C-3 are checked for proper operation by recorded measurements of nitrogen oxides ("NOx") and carbon monoxide ("CO") emissions at least quarterly and within two weeks after each occurrence of engine maintenance that may be expected to increase emissions, by January 29, 2021.
 - b. By measuring and recording the NOx and CO emissions from Engines C-1, C-2, and C-3, by February 10, 2021.

II. ALLEGATIONS

During an investigation conducted from June 14, 2021 through August 4, 2021, an investigator documented that the Respondent failed to check the engine for proper operation by recorded measurements of NOx and CO emissions at least quarterly and within two weeks after each occurrence of engine maintenance that may be expected to increase emissions, in violation of 30 TEX. ADMIN. CODE §§ 117.8140(b) and 122.143(4), Federal Operating Permit No. O100/General Operating Permit No. 511, Table 23, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not measure the NOx and CO emissions from Engines C-1, C-2, and C-3 from the third quarter of 2016 through the fourth quarter of 2020.

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: Kinder Morgan Tejas Pipeline LLC, Docket No. 2021-1083-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. All relief not expressly granted in this Order is denied.
3. 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.
4. 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.
5. 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.
6. 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.

7. 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

8/10/2022

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 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.



Signature

7/5/2022

Date

Steven M Romano

Name (Printed or typed)
Authorized Representative of
Kinder Morgan Tejas Pipeline LLC

VP Operations

Title

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