

**Executive Summary – Enforcement Matter – Case No. 62728**  
**Maple Energy Holdings, LLC**  
**RN111527826**  
**Docket No. 2022-0973-AIR-E**

**Order Type:**

1660 Agreed Order

**Findings Order Justification:**

N/A

**Media:**

AIR

**Small Business:**

No

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

Yucca CTP Sales, located approximately 1.75 miles west of County Road 210 and Farm-to-Market Road 1934 intersection, Pecos, Reeves County

**Type of Operation:**

Oil and gas production plant

**Other Significant Matters:**

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

**Texas Register Publication Date:** November 29, 2024

**Comments Received:** No

***Penalty Information***

**Total Penalty Assessed:** \$14,250

**Amount Deferred for Expedited Settlement:** \$2,850

**Total Paid to General Revenue:** \$11,400

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

Payment Plan: N/A

**Compliance History Classifications:**

Person/CN - Satisfactory

Site/RN - Unclassified

**Major Source:** No

**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:** April 22, 2022

**Date(s) of NOE(s):** July 22, 2022

**Executive Summary – Enforcement Matter – Case No. 62728**  
**Maple Energy Holdings, LLC**  
**RN111527826**  
**Docket No. 2022-0973-AIR-E**

***Violation Information***

1. Failed to obtain authorization prior to constructing or modifying a source of air contaminants. Specifically, on September 17, 2021, the Respondent began operating a natural gas liquid knockout tank at the Plant prior to obtaining the proper authorization [30 TEX. ADMIN. CODE § 116.110(a) and TEX. HEALTH & SAFETY CODE §§ 382.0518(a) and 382.085(b)].

2. Failed to maintain all emissions control equipment in good condition and operated properly during operation of the facility. Specifically, TCEQ staff observed emissions from an open thief hatch on a storage tank using an Optical Gas Imaging Camera and documented staining on the outside of the tank indicating an overflow of liquids at the Plant [30 TEX. ADMIN. CODE §106.4(c) and TEX. HEALTH & SAFETY CODE § 382.085(b)].

***Corrective Actions/Technical Requirements***

**Corrective Action(s) Completed:**

The Respondent implemented the following corrective measures:

- a. On June 29, 2022 certified the emissions at the Plant under New Source Review Registration No. 169516; and
- b. By August 17, 2022, closed the thief hatch, conducted routine visual inspections, and leak detection and repair surveys to ensure that the tank is maintained in good condition and operated properly during operations at the Plant.

**Technical Requirements:**

N/A

***Contact Information***

**TCEQ Attorney:** N/A

**TCEQ Enforcement Coordinator:** Danielle Porras, Enforcement Division, Enforcement Team 2, MC R-12, (713) 767-3682; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548

**Respondent:** Phil Hudgens, Chief Operating Officer, Maple Energy Holdings, LLC, 602 Sawyer Street, Suite 710, Houston, Texas 77007

**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-Aug-2022	<b>Screening</b>	9-Aug-2022	<b>EPA Due</b>	
	<b>PCW</b>	24-Sep-2024				

## RESPONDENT/FACILITY INFORMATION

<b>Respondent</b>	Maple Energy Holdings, LLC				
<b>Reg. Ent. Ref. No.</b>	RN111527826				
<b>Facility/Site Region</b>	7-Midland	<b>Major/Minor Source</b>	Minor		

## CASE INFORMATION

<b>Enf./Case ID No.</b>	62728	<b>No. of Violations</b>	2
<b>Docket No.</b>	2022-0973-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>	Danielle Porras
		<b>EC's Team</b>	Enforcement Team 2
<b>Admin. Penalty \$ 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>	\$17,500
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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.

<b>Compliance History</b>	0.0%	<b>Adjustment</b>	<b>Subtotals 2, 3, &amp; 7</b>	\$0
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Notes: Since the reduction for one notice of intent to conduct an audit is below zero, the adjustment percentage (Subtotal 2) defaults to zero.

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

<b>Good Faith Effort to Comply Total Adjustments</b>	<b>Subtotal 5</b>	-\$3,250
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<b>Economic Benefit</b>	0.0%	<b>Enhancement*</b>	<b>Subtotal 6</b>	\$0
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Total EB Amounts: \$275  
Estimated Cost of Compliance: \$10,000  
\*Capped at the Total EB \$ Amount

<b>SUM OF SUBTOTALS 1-7</b>	<b>Final Subtotal</b>	\$14,250
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<b>OTHER FACTORS AS JUSTICE MAY REQUIRE</b>	0.0%	<b>Adjustment</b>	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes:

<b>Final Penalty Amount</b>	\$14,250
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<b>STATUTORY LIMIT ADJUSTMENT</b>	<b>Final Assessed Penalty</b>	\$14,250
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<b>DEFERRAL</b>	20.0%	<b>Reduction</b>	<b>Adjustment</b>	-\$2,850
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Reduces the Final Assessed Penalty by the indicated percentage.

Notes:

Deferral offered for expedited settlement.

<b>PAYABLE PENALTY</b>	\$11,400
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<b>Screening Date</b>	9-Aug-2022	<b>Docket No.</b>	2022-0973-AIR-E	<b>PCW</b>
<b>Respondent</b>	Maple Energy Holdings, LLC			
<b>Case ID No.</b>	62728			
<b>Reg. Ent. Reference No.</b>	RN111527826			
<b>Media</b>	Air			
<b>Enf. Coordinator</b>	Danielle Porras			

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

## 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	0	0%
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)** 0%

### >> 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**

Since the reduction for one notice of intent to conduct an audit is below zero, the adjustment percentage (Subtotal 2) defaults to zero.

**Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7)** 0%

### >> Final Compliance History Adjustment

**Final Adjustment Percentage \*capped at 100%** 0%

<b>Screening Date</b> 9-Aug-2022 <b>Respondent</b> Maple Energy Holdings, LLC <b>Case ID No.</b> 62728 <b>Reg. Ent. Reference No.</b> RN111527826 <b>Media</b> Air <b>Enf. Coordinator</b> Danielle Porras <b>Violation Number</b> 1 <b>Rule Cite(s)</b> 30 Tex. Admin. Code § 116.110(a) and Tex. Health & Safety Code §§ 382.0518(a) and 382.085(b).  <b>Violation Description</b> Failed to obtain authorization prior to constructing or modifying a source of air contaminants. Specifically, on September 17, 2021, the Respondent began operating a natural gas liquid knockout tank at the Plant prior to obtaining the proper authorization.	<b>Docket No.</b> 2022-0973-AIR-E	<b>PCW</b> <i>Policy Revision 5 (January 28, 2021)</i> <i>PCW Revision February 11, 2021</i>
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	<b>Base Penalty</b> \$25,000
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**>> Environmental, Property and Human Health Matrix**

<b>OR</b>		<b>Harm</b>			
	<b>Release</b>	Major	Moderate	Minor	
	Actual				<b>Percent</b> 0.0%
	Potential				

**>> Programmatic Matrix**

	Falsification	Major	Moderate	Minor	
		x			<b>Percent</b> 10.0%

Matrix Notes	100% of the rule requirements were not met.
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	<b>Adjustment</b> \$22,500
	\$2,500

**Violation Events**

Number of Violation Events	4	285	Number of violation days
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daily					<b>Violation Base Penalty</b> \$10,000
weekly					
monthly					
quarterly		x			
semiannual					
annual					
single event					

Four quarterly events are recommended from the September 17, 2021 initial date of non-compliance to the June 29, 2022 compliance date.
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**Good Faith Efforts to Comply**

	25.0%	
		<b>Reduction</b> \$2,500

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

Notes	The Respondent completed the corrective measures on June 29, 2022, prior to the Notice of Enforcement ("NOE") dated July 29, 2022
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	<b>Violation Subtotal</b> \$7,500
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**Economic Benefit (EB) for this violation**

	<b>Statutory Limit Test</b>
<b>Estimated EB Amount</b> \$195	<b>Violation Final Penalty Total</b> \$7,500
<b>This violation Final Assessed Penalty (adjusted for limits)</b> \$7,500	

# Economic Benefit Worksheet

**Respondent** Maple Energy Holdings, LLC  
**Case ID No.** 62728  
**Reg. Ent. Reference No.** RN111527826  
**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	\$5,000	17-Sep-2021	29-Jun-2022	0.78	\$195	n/a	\$195
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

Estimated cost to certify the emissions at the Plant under New Source Review Registration No. 169516. The Date Required is the initial date of non-compliance 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

\$5,000

**TOTAL**

\$195

<b>Screening Date</b> 9-Aug-2022 <b>Respondent</b> Maple Energy Holdings, LLC <b>Case ID No.</b> 62728 <b>Reg. Ent. Reference No.</b> RN111527826 <b>Media</b> Air <b>Enf. Coordinator</b> Danielle Porras <b>Violation Number</b> 2 <b>Rule Cite(s)</b> 30 Tex. Admin. Code § 106.4(c) and Tex. Health & Safety Code § 382.085(b)	<b>Docket No.</b> 2022-0973-AIR-E	<b>PCW</b> <i>Policy Revision 5 (January 28, 2021)</i> <i>PCW Revision February 11, 2021</i>
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**Violation Description**  
 Failed to maintain all emissions control equipment in good condition and operated properly during operation of the facility. Specifically, TCEQ staff observed emissions from an open thief hatch on a storage tank using an Optical Gas Imaging Camera and documented staining on the outside of the tank indicating an overflow of liquids at the Plant.

**Base Penalty** \$25,000

**>> Environmental, Property and Human Health Matrix**

<b>OR</b>		<b>Harm</b>			
	<b>Release</b>	Major	Moderate	Minor	
	Actual			x	<b>Percent</b> 15.0%
Potential					

**>> Programmatic Matrix**

	Falsification	Major	Moderate	Minor	
					<b>Percent</b> 0.0%

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

**Adjustment** \$21,250

\$3,750

**Violation Events**

Number of Violation Events	2	109	Number of violation days
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daily		<b>Violation Base Penalty</b> \$7,500
weekly		
monthly		
quarterly	x	
semiannual		
annual		
single event		

Two quarterly events are recommended.

**Good Faith Efforts to Comply**

	<b>10.0%</b>	
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		x
N/A		

Notes: The Respondent completed the corrective measures by August 17, 2022, after the NOE dated July 29, 2022.

**Violation Subtotal** \$6,750

**Economic Benefit (EB) for this violation**

<b>Estimated EB Amount</b> \$80	<b>Statutory Limit Test</b>
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**Violation Final Penalty Total** \$6,750

**This violation Final Assessed Penalty (adjusted for limits)** \$6,750

# Economic Benefit Worksheet

**Respondent** Maple Energy Holdings, LLC  
**Case ID No.** 62728  
**Reg. Ent. Reference No.** RN111527826  
**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)	\$5,000	22-Apr-2022	17-Aug-2022	0.32	\$80	n/a	\$80

### Notes for DELAYED costs

Estimated cost to close the thief hatch, conduct routine visual inspections, and leak detection and repair surveys to ensure that the tank is maintained in good condition and operated properly during operations at the Plant. The Date Required is the investigation date 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

\$5,000

**TOTAL**

\$80





# Compliance History Report

Compliance History Report for CN605980721, RN111527826, Rating Year 2023 which includes Compliance History (CH) components from September 1, 2018, through August 31, 2023.

**Customer, Respondent, or Owner/Operator:** CN605980721, Maple Energy Holdings, LLC  
**Classification:** SATISFACTORY  
**Rating:** 16.38

**Regulated Entity:** RN111527826, YUCCA CTP SALES  
**Classification:** UNCLASSIFIED  
**Rating:** -----

**Complexity Points:** 4  
**Repeat Violator:** NO

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

**Location:** Approximately 1.75 miles west of the County Road 210 and Farm-to-Market Road 1934 intersection, in Reeves County, Texas

**TCEQ Region:** REGION 07 - MIDLAND

**ID Number(s):**  
**AIR NEW SOURCE PERMITS REGISTRATION** 169516

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

**Date Compliance History Report Prepared:** August 30, 2024

**Agency Decision Requiring Compliance History:** Enforcement

**Component Period Selected:** August 30, 2019 to August 30, 2024

**TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.**  
**Name:** Danielle Porras  
**Phone:** (512) 239-2923

## Site and Owner/Operator History:

- 1) Has the site been in existence and/or operation for the full five year compliance period? NO
- 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.):**

N/A

### **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.

N/A

### **F. Environmental audits:**

Notice of Intent Date: 12/13/2023 (1950111)

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  
MAPLE ENERGY HOLDINGS, LLC  
RN111527826

§ BEFORE THE  
§  
§ TEXAS COMMISSION ON  
§  
§ ENVIRONMENTAL QUALITY

## AGREED ORDER DOCKET NO. 2022-0973-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 Maple Energy Holdings, 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 an oil and gas production plant located approximately 1.75 miles west of the County Road 210 and Farm-to-Market Road 1934 intersection in Reeves County, Texas (the "Plant"). The Plant 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 \$14,250 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$11,400 of the penalty and \$2,850 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 implemented the following corrective measures at the Plant:
  - a. On June 29, 2022 certified the emissions at the Plant under New Source Review Registration No. 169516; and
  - b. By August 17, 2022, closed the thief hatch, conducted routine visual inspections, and leak detection and repair surveys to ensure that the tank is maintained in good condition and operated properly during operations at the Plant.

## **II. ALLEGATIONS**

During an investigation at the Plant conducted on April 22, 2022, an investigator documented that the Respondent:

1. Failed to obtain authorization prior to constructing or modifying a source of air contaminants, in violation of 30 TEX. ADMIN. CODE § 116.110(a) and TEX. HEALTH & SAFETY CODE §§ 382.0518(a) and 382.085(b). Specifically, on September 17, 2021, the Respondent began operating a natural gas liquid knockout tank at the Plant prior to obtaining the proper authorization.
2. Failed to maintain all emissions control equipment in good condition and operated properly during operation of the facility, in violation of 30 TEX. ADMIN. CODE § 106.4(c) and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, TCEQ staff observed emissions from an open thief hatch on a storage tank using an Optical Gas Imaging Camera and documented staining on the outside of the tank indicating an overflow of liquids at the Plant.

## **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: Maple Energy Holdings, LLC, Docket No. 2022-0973-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.
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

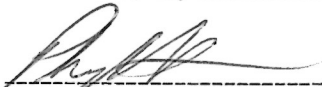
11/27/2024  
Date

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.

  
Signature

10/21/24  
Date

PHIL HUDGENS  
Name (Printed or typed)  
Authorized Representative of  
Maple Energy Holdings, LLC

COO  
Title

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

MAPLE ENERGY HOLDINGS, LLC  
7055 OLD KATY RD, SUITE 1194  
HOUSTON, TX 77024

**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.