Order Type:

1660 Agreed Order

Findings Order Justification:

N/A **Media:** AIR

**Small Business:** 

No

Location(s) Where Violation(s) Occurred:

Chevron Minerals 7 Battery, located approximately 4,675 feet west of the Tipton Road and Weatherby Road intersection, Pecos, Reeves County

Type of Operation:

Sweet natural gas and liquid hydrocarbons processing facility

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: April 19, 2024

Comments Received: No

**Penalty Information** 

**Total Penalty Assessed:** \$19,695

Amount Deferred for Expedited Settlement: \$3,939

**Total Paid to General Revenue:** \$15,756 **Total Due to General Revenue:** \$0

Payment Plan: N/A

**Compliance History Classifications:** 

Person/CN - Satisfactory

Site/RN - High

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:** December 19, 2022 through April 27, 2023 and December

19, 2022 through May 23, 2023

Date(s) of NOE(s): June 7, 2023, June 9, 2023, June 13, 2023, and June 28, 2023

## Violation Information

- 1. Failed to prevent unauthorized emissions. Specifically, the Respondent released 13,489.00 pounds ("lbs") of volatile organic compounds ("VOC") as fugitive emissions, during an emissions event (Incident No. 392094) that began on March 20, 2019 and lasted 48 hours [30 Tex. ADMIN. CODE § 106.6(b), Permit By Rule ("PBR") Registration No. 170054, and Tex. Health & Safety Code § 382.085(b)].
- 2. 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. 392094 was due by March 21, 2019 at 12:00 a.m., but was not submitted until December 19, 2022 at 1:02 p.m. [30 Tex. ADMIN. CODE § 101.201(a)(1)(B) and Tex. Health & Safety Code § 382.085(b)].
- 3. Failed to submit a final record for a reportable emissions event no later than two weeks after the end of the emissions event. Specifically, the final record for Incident No. 392094 was due by April 5, 2019, but was not submitted until December 19, 2022 [30 Tex. Admin. Code § 101.201(c) and Tex. Health & Safety Code § 382.085(b)].
- 4. Failed to prevent unauthorized emissions. Specifically, the Respondent released 6,776.00 lbs of VOC as fugitive emissions, during an emissions event (Incident No. 392102) that occurred on October 27, 2020 and lasted 23 hours and 59 minutes [30 Tex. ADMIN. CODE § 106.6(b), PBR Registration No. 170054, and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 5. 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. 392102 was due by October 28, 2020 at 12:00 a.m., but was not submitted until December 19, 2022 at 2:05 p.m. [30 Tex. ADMIN. CODE § 101.201(a)(1)(B) and Tex. Health & Safety Code § 382.085(b)].
- 6. Failed to submit a final record for a reportable emissions event no later than two weeks after the end of the emissions event. Specifically, the final record for Incident No. 392102 was due by November 10, 2020, but was not submitted until December 19, 2022 [30 Tex. Admin. Code § 101.201(c) and Tex. Health & Safety Code § 382.085(b)].
- 7. Failed to prevent unauthorized emissions. Specifically, the Respondent released 5,929.00 lbs of VOC as fugitive emissions, during an emissions event (Incident No. 392095) that occurred on January 11, 2020 and lasted 23 hours and 59 minutes [30 Tex. Admin. Code § 106.6(b), PBR Registration No. 170054, and Tex. Health & Safety Code § 382.085(b)].

- 8. 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. 392095 was due by January 12, 2020 at 12:00 a.m., but was not submitted until December 19, 2022 at 1:08 p.m. [30 Tex. ADMIN. CODE § 101.201(a)(1)(B) and Tex. Health & Safety Code § 382.085(b)].
- 9. Failed to submit a final record for a reportable emissions event no later than two weeks after the end of the emissions event. Specifically, the final record for Incident No. 392095 was due by January 25, 2020, but was not submitted until December 19, 2022 [30 Tex. Admin. Code § 101.201(c) and Tex. Health & Safety Code § 382.085(b)].
- 10. Failed to prevent unauthorized emissions. Specifically, the Respondent released 11,858.00 lbs of VOC as fugitive emissions, during an emissions event (Incident No. 392097) that occurred on September 12, 2020 and lasted 23 hours and 59 minutes [30 Tex. Admin. Code § 106.6(b), PBR Registration No. 170054, and Tex. Health & Safety Code § 382.085(b)].
- 11. 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. 392097 was due by September 13, 2020 at 12:00 a.m., but was not submitted until December 19, 2022 at 1:19 p.m. [30 Tex. ADMIN. CODE § 101.201(a)(1)(B) and Tex. Health & Safety Code § 382.085(b)].
- 12. Failed to submit a final record for a reportable emissions event no later than two weeks after the end of the emissions event. Specifically, the final record for Incident No. 392097 was due by September 26, 2020, but was not submitted until December 19, 2022 [30 Tex. Admin. Code § 101.201(c) and Tex. Health & Safety Code § 382.085(b)].
- 13. Failed to prevent unauthorized emissions. Specifically, the Respondent released 5,438.00 lbs of VOC as fugitive emissions, during an emissions event (Incident No. 392104) that occurred on January 21, 2021 and lasted 23 hours and 59 minutes [30 Tex. Admin. Code § 106.6(b), PBR Registration No. 170054, and Tex. Health & Safety Code § 382.085(b)].
- 14. 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. 392104 was due by January 22, 2021 at 12:00 a.m., but was not submitted until December 19, 2022 at 2:18 p.m. [30 Tex. ADMIN. CODE § 101.201(a)(1)(B) and Tex. Health & Safety Code § 382.085(b)].
- 15. Failed to submit a final record for a reportable emissions event no later than two weeks after the end of the emissions event. Specifically, the final record for Incident No. 392104 was due by February 4, 2021, but was not submitted until December 19, 2022 [30 Tex. Admin. Code § 101.201(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. By November 15, 2022, successfully completed an automation project to shut in production at the Site during times when gas is unable to be sent to the sales line in order to prevent the recurrence of emissions events due to the same or similar causes as Incident Nos. 392094, 392095, 392097, 392102, and 392104; and

b. On December 19, 2022, submitted the initial notifications for Incident Nos. 392094, 392095, 392097, 392102, and 392104 and submitted the final records for Incident Nos. 392094, 392095, 392097, 392102, and 392104.

# **Technical Requirements:**

N/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:** Margrethe Berge, Director of Air Quality, OXY USA WTP LP, 5 Greenway Plaza, Suite 110, Houston, Texas 77046

Cuong Phan, Asset Director, OXY USA WTP LP, 5 Greenway Plaza, Suite 110, Houston, Texas 77046

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



# Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

ATES Assigned 10-Jul-2023

PCW 21-Feb-2024 Screening 10-Jul-2023 EPA Due

DECRANDENT /EACTIT	TV THEODIA TION		
RESPONDENT/FACILI			
Respondent	OXY USA WTP LP		
Reg. Ent. Ref. No.	RN110408671		
Facility/Site Region	7-Midland	Major/Minor Source Minor	
CASE INFORMATION			

CASE INFORMATION

Enf./Case ID No. 64273
Docket No. 2023-0864-AIR-E
Media Program(s) Air
Multi-Media
Multi-Media
Government/Non-Profit
Enf. Coordinator
FC's Team
Enforcement Team 2

Admin. Penalty \$ Limit Minimum

\$0
Maximum

\$25,000

			Penalty C	Calcula	ition Section	on		
TOTA	L BASE PENA	LTY (Sum	of violation base				Subtotal 1	\$26,250
				•				
ADJU	STMENTS (+	/-) IO SUB	IOIAL 1 ving the Total Base Penalty	/ (Subtotal :	I) by the indicated p	ercentage		
	Compliance Hi		mig the rotal base remain	0.0%	Adjustment		otals 2, 3, & 7	\$0
	Notes		duction for one Notice the Adjustment Perce					
	Culpability	No		0.0%	Enhancement		Subtotal 4	\$0
	Notes	The	Respondent does not	meet the	culpability crite	ria.		
	Good Faith Eff	ort to Comply	Total Adjustments	S			Subtotal 5	-\$6,555
			-					
	Economic Bene	efit		0.0%	Enhancement*		Subtotal 6	\$0
		Total EB Amour I Cost of Complian	45/02:		ed at the Total EB \$ A	Amount		
SUM (	OF SUBTOTA	LS 1-7					Final Subtotal	\$19,695
			MAY REQUIRE		0.0%		Adjustment	<b>\$0</b>
Reduces	or enhances the Final	Subtotal by the II	idicated percentage.					
	Notes							
						Final Pe	nalty Amount	\$19,695
STAT	UTORY LIMIT	Γ ADJUSTM	ENT			Final Ass	essed Penalty	\$19,695
DEFE	RRAL				20.0%	Reduction	Adjustment	-\$3,939
	the Final Assessed Pe	nalty by the indica	ated percentage.					. ,
	Notes		Deferral offered for	r expedite	d settlement.			
PAYA	BLE PENALT	Υ						\$15,756

**PCW** 

Policy Revision 5 (January 28, 2021) PCW Revision February 11, 2021

Screening Date 10-Jul-2023
Respondent OXY USA WTP LP
Case ID No. 64273

Reg. Ent. Reference No. RN110408671

**Media** Air

Enf. Coordinator Yuliya Dunaway

Number of   Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)   0   0%	Compliance Hi	Compliance History Worksheet story Site Enhancement (Subtotal 2)			
Orders  Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)  Orders  Any adjudicated final enforcement orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission  Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government, or any final prohibitory emergency orders issued by the commission  Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)  Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or onsent decrees meeting criteria)  Any criminal convictions of this state or the federal government (number of judgments or the federal government)  Convictions  Convictions  Chronic excessive emissions events (number of events)  Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1 -1%  Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were 0 0%  Other Participation in a voluntary pollution reduction program  Adju	_		Number	Adjust.	
Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)  Orders  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  Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees containing a denial or or liability of this state or the federal government (number of judgments or consent decrees meeting criteria)  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 (number of or the federal government)  Convictions  Any criminal convictions of this state or the federal government (number of 0 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0	NOVs	· · · · · · · · · · · · · · · · · · ·	0	0%	
Orders meeting criteria)  Orders 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  Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)  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 (number of judgments or the federal government (number of judgments or the federal government (number of consent decrees meeting criteria)  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 (number of consent decrees meeting criteria)  Any criminal convictions of this state or the federal government (number of control to cont		Other written NOVs	0	0%	
a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission  Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)  Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees meeting criteria)  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 (number of the federal government (number of the federal government)  Convictions  Convictions  Chronic excessive emissions events (number of events)  Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)  Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)  Other  Environmental management systems in place for one year or more  Voluntary on-site compliance assessments conducted by the executive director under a special assistance program  Participation in a voluntary pollution reduction program  No  Own  Adjustment Percentage (Subtotal 2)  Satisfactory Performer  Compliance  History  Since the reduction for one N		, ,	0	0%	
Judgments and Consent Decrees  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  Convictions  Any criminal convictions of this state or the federal government (number of counts)  Emissions  Chronic excessive emissions events (number of events)  Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)  Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)  Environmental management systems in place for one year or more  Other  Other  Environmental management systems in place for one year or more  Voluntary on-site compliance assessments conducted by the executive director under a special assistance program  Participation in a voluntary pollution reduction program  Participation in a vol	Orders	a denial of liability, or default orders of this state or the federal government, or	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 0 0% or the federal government  Convictions Any criminal convictions of this state or the federal government (number of counts)  Emissions Chronic excessive emissions events (number of events) 0 0%  Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)  Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)  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  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  Adjustment Percentage (Subtotal 2)  Repeat Violator (Subtotal 3)  No Adjustment Percentage (Subtotal 3)  Compliance History Performer  Compliance History Summary  Since the reduction for one Notice of Intent to conduct an audit is less than zero, the Adjustment Percentage (Subtotal 2) Percentage (Subtotal 2) defaults to zero.		of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)		0%	
Emissions   Chronic excessive emissions events (number of events)   0 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		0%	
Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)  Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were 0 0% disclosed)  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% Early compliance with, or offer of a product that meets future state or federal government environmental requirements  Adjustment Percentage (Subtotal 2)  Repeat Violator (Subtotal 3)  No Adjustment Percentage (Subtotal 3)  Compliance History Person Classification (Subtotal 7)  Satisfactory Performer  Compliance History Summary  Since the reduction for one Notice of Intent to conduct an audit is less than zero, the Adjustment Percentage (Subtotal 2) defaults to zero	Conviction	` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` `	0	0%	
Audits  Audits  Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)  Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were 0 0% disclosed)  Environmental management systems in place for one year or more  Voluntary on-site compliance assessments conducted by the executive director under a special assistance program  Participation in a voluntary pollution reduction program  Participation in a voluntary pollution reduction program  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  Adjustment Percentage (Subtotal 2)  Repeat Violator (Subtotal 3)  No Adjustment Percentage (Subtotal 3)  Compliance History Performer  Adjustment Percentage (Subtotal 7)  Satisfactory Performer  Compliance  History  Since the reduction for one Notice of Intent to conduct an audit is less than zero, the Adjustment Percentage (Subtotal 2) defaults to zero.	Emissions	Chronic excessive emissions events (number of events)	0	0%	
Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)    Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)    Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosured)   Disclosures of violations were disclosured)   Disclosures of violations were disclosured)   Disclosures of violations were disclosured)   Voluntary on-site compliance assessments conducted by the executive director No 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0%	Audite	Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature,		-1%	
Other  Other  Voluntary on-site compliance assessments conducted by the executive director under a special assistance program  Participation in a voluntary pollution reduction program  Participation in a voluntary pollution reduction program  Participation in a voluntary pollution reduction program  No 0%  Adjustment Percentage (Subtotal 2)  Repeat Violator (Subtotal 3)  No Adjustment Percentage (Subtotal 3)  Compliance History Person Classification (Subtotal 7)  Satisfactory Performer  Adjustment Percentage (Subtotal 7)  Compliance History Summary  Compliance History Summary  Since the reduction for one Notice of Intent to conduct an audit is less than zero, the Adjustment Percentage (Subtotal 2) defaults to zero.	Addits	Privilege Act, 74th Legislature, 1995 (number of audits for which violations were		0%	
Other  Under a special assistance program Participation in a voluntary pollution reduction program Early compliance with, or offer of a product that meets future state or federal government environmental requirements  Adjustment Percentage (Subtotal 2)  Repeat Violator (Subtotal 3)  No  Adjustment Percentage (Subtotal 3)  Compliance History Person Classification (Subtotal 7)  Satisfactory Performer  Adjustment Percentage (Subtotal 7)  Compliance History Summary  Compliance History Summary  Since the reduction for one Notice of Intent to conduct an audit is less than zero, the Adjustment Percentage (Subtotal 2) defaults to zero.		Environmental management systems in place for one year or more	No	0%	
Participation in a voluntary pollution reduction program  Early compliance with, or offer of a product that meets future state or federal government environmental requirements  Adjustment Percentage (Subtotal 2)  Repeat Violator (Subtotal 3)  No  Adjustment Percentage (Subtotal 3)  Compliance History Person Classification (Subtotal 7)  Satisfactory Performer  Adjustment Percentage (Subtotal 7)  Compliance History Summary  Compliance History Summary  Since the reduction for one Notice of Intent to conduct an audit is less than zero, the Adjustment Percentage (Subtotal 2) defaults to zero.	Other	· · · · · · · · · · · · · · · · · · ·	No	0%	
Repeat Violator (Subtotal 3)  No  Adjustment Percentage (Subtotal 2)  Repeat Violator (Subtotal 3)  No  Adjustment Percentage (Subtotal 3)  Compliance History Person Classification (Subtotal 7)  Satisfactory Performer  Adjustment Percentage (Subtotal 7)  Compliance History Summary  Compliance History Summary  Since the reduction for one Notice of Intent to conduct an audit is less than zero, the Adjustment Percentage (Subtotal 2) defaults to zero.	Other	Participation in a voluntary pollution reduction program	No	0%	
Repeat Violator (Subtotal 3)  No  Adjustment Percentage (Subtotal 3)  Compliance History Person Classification (Subtotal 7)  Satisfactory Performer  Adjustment Percentage (Subtotal 7)  Compliance History Summary  Compliance History  Since the reduction for one Notice of Intent to conduct an audit is less than zero, the Adjustment Percentage (Subtotal 2) defaults to zero.		, , , , , , , , , , , , , , , , , , , ,	No	0%	
Compliance History Person Classification (Subtotal 7)  Satisfactory Performer  Adjustment Percentage (Subtotal 7)  Compliance History Summary  Compliance History  Since the reduction for one Notice of Intent to conduct an audit is less than zero, the Adjustment Percentage (Subtotal 2) defaults to zero.		Adjustment Per	centage (Sul	ototal 2)	00
Compliance History Performer  Adjustment Percentage (Subtotal 7)  Compliance History Summary  Compliance History  Since the reduction for one Notice of Intent to conduct an audit is less than zero, the Adjustment Percentage (Subtotal 2) defaults to zero.	Repeat Violato	r (Subtotal 3)			
Compliance History Summary  Compliance History  Since the reduction for one Notice of Intent to conduct an audit is less than zero, the Adjustment Percentage (Subtotal 2) defaults to zero.		Adjustment Per	centage (Sul	ototal 3)	09
Compliance History  Since the reduction for one Notice of Intent to conduct an audit is less than zero, the Adjustment Percentage (Subtotal 2) defaults to zero.	Compliance Hi	story Person Classification (Subtotal 7)			
Compliance History  Since the reduction for one Notice of Intent to conduct an audit is less than zero, the Adjustment Percentage (Subtotal 2) defaults to zero.	Satisfacto	y Performer Adjustment Per	centage (Sul	btotal 7)	00
History  Percentage (Subtotal 2) defaults to zero.	Compliance Hi	story Summary			
	History	Since the reduction for one Notice of Intent to conduct an addit is less than zero, to	he Adjustment		
, , , , , , , , , , , , , , , , , , , ,			Subtotals 2,	- 3, & 7) [	0%
Final Compliance History Adjustment	inal Compliand				0%
Final Adjustment Percentage *capped at 100%			age *capped	at 100%	_

	Screening Date		<b>Docket No.</b> 2023-0864-AIR-E	PCW
	-	OXY USA WTP LP	Policy	Revision 5 (January 28, 2021)
_	Case ID No.		PC	W Revision February 11, 2021
Reg.	Ent. Reference No.			
	Media			
	Enf. Coordinator			
	Violation Number			1
	Rule Cite(s)	_	106.6(b), Permit By Rule ("PBR") Registration No.	
		1/0054, and	Tex. Health & Safety Code § 382.085(b)	
			zed emissions. Specifically, the Respondent released ) of volatile organic compounds ("VOC") as fugitive	
	<b>Violation Description</b>		ons event (Incident No. 392094) that began on March	
			0, 2019 and lasted 48 hours.	
			Base Penalty	\$25,000
			base reliaity	\$23,000
>> Env	ironmental, Prope	rty and Human Health	Matrix	
	Dalassa	Harm	Minou	
OR	<b>Release</b> Actual		Minor	
OK	Potential		Percent 25.0%	
	i otenda		25.0%	
>>Pro	grammatic Matrix			
•	Falsification	Major Moderate	Minor	
			Percent 0.0%	
				1
			een exposed to significant amounts of pollutants that	
	Notes ald not excee	·	f human health or environmental receptors as a result the violation.	
		OI	the violation.	1
			Adjustment \$18,750	
				¢6.250
				\$6,250
Violatio	on Events			
	Number of \	/iolation Events 1	Number of violation days	
		daily	1	
		weekly x		
		monthly		
		quarterly	Violation Base Penalty	\$6,250
		semiannual	,	40/-00
		annual		
		single event		
				a
		One weekly	event is recommended.	
		One weekly	event is recommended.	
Good F	aith Efforts to Com			\$1,562
		Before NOE/NOV Extraordinary	NOE/NOV to EDPRP/Settlement Offer	
		,		
		Ordinary x		
		N/A		
		· · · · · · · · · · · · · · · · · · ·	dent completed the corrective measures by 5, 2022, prior to the Notice of Enforcement	
		Notes November 1	("NOE") dated June 7, 2023.	
			, , , , , , , , , , , , , , , , , , , ,	
			Violation Subtotal	\$4,688
Econor	nic Benefit (EB) for	this violation	Statutory Limit Test	
				44.505
	Estimate	ed EB Amount	\$9,151 Violation Final Penalty Total	\$4,688
		This viola	ation Final Assessed Penalty (adjusted for limits)	\$4,688

	E	conomic	Benefit	Woi	rksheet		
Respondent	OXY USA WTP	LP					
Case ID No.	64273						
Reg. Ent. Reference No.	RN110408671						
Media	Air					Percent Interest	Years of
Violation No.	1					Percent Interest	Depreciation
						5.0	15
	<b>Item Cost</b>	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	Costs Saved	EB Amount
Item Description		•					
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	φ <u>το</u> 000	20 May 2010	1E Nov. 2022	0.00	\$0	n/a	\$0
Other (as needed)	\$50,000	20-Mar-2019	15-Nov-2022	3.66	\$9,151	n/a	\$9,151
Notes for DELAYED costs	times when ga due to the sa	s is unable to be ime or similar cau	sent to the sale uses as Incident	s line in Nos. 39	order to prevent ( 2094, 392095, 39	in production at the the recurrence of er 2097, 392102, and I Date is the date o	missions events 392104. The
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	item (except for	one-time avoide	d 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	<u>\$0</u>
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$50,000			TOTAL		\$9,151

	E	conomic	Benefit	Woi	rksheet		
Respondent	OXY USA WTP	LP					
Case ID No.							
Reg. Ent. Reference No.							
Media							Years of
Violation No.						<b>Percent Interest</b>	Depreciation
violation No.	2						_
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	Costs Saved	EB Amount
Item Description							
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)	\$1,250	21-Mar-2019	19-Dec-2022	3.75	\$234	n/a	\$234
Notes for DELAYED costs			). The Date Re	quired i		4, 392095, 392097 t notification was di	
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	item (except for	one-time avoide	d 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		\$1,250			TOTAL		\$234

	Screening Date	10-Jul-2023	<b>Docket No.</b> 2023-0864-AIR-E	PCW
	<u>-</u>	OXY USA WTP LP	Policy	Revision 5 (January 28, 2021)
_	Case ID No.		PC	W Revision February 11, 2021
Reg.	Ent. Reference No.			
	Media			
	Enf. Coordinator Violation Number			
	Rule Cite(s)			1
	nuic cita(s)		e § 101.201(c) and Tex. Health & Safety Code § 382.085(b)	
			al record for a reportable emissions event no later than two d of the emissions event. Specifically, the final record for	
	<b>Violation Description</b>		94 was due by April 5, 2019, but was not submitted until	
			December 19, 2022.	
				]
			Base Penalty	\$25,000
			<u> </u>	
>> Env	ironmental, Prope	rty and Human H Ha		
	Release			
OR	Actual			
	Potential		Percent 0.0%	
🗕				
>>Pro	grammatic Matrix Falsification	Major Mode	rate Minor	
	1 disilication	Major Mode	X Percent 1.0%	
			X 2.070	_
	Matrix			]
	Matrix Notes	Less than 30%	of the rule requirements were not met.	
	Notes			
			<b>Adjustment</b> \$24,750	1
			Adjustille iit \$24,750	<u>'</u>
				\$250
Violation	on Events			
	Number of	Violation Events 1	1354 Number of violation days	
			,	
		daily		
		weekly		
		monthly	V. 1 D. D. II.	+250
		quarterly semiannual	Violation Base Penalty	\$250
		annual		
		single event		
				_
		One	single event is recommended.	
		0110	Single event is recommended.	
Good F	aith Efforts to Com	nly 2	5.0% Reduction	\$62
doou i	aith Enoits to con		E/NOV NOE/NOV to EDPRP/Settlement Offer	<b>402</b>
		Extraordinary		
		Ordinary x		
		N/A		
			espondent completed the corrective measures on	
		Notes Dec	ember 19, 2022, prior to the NOE dated June 7,	
			2023.	
			Violation Subtotal	\$188
Econor	nic Benefit (EB) fo	r this violation	Statutory Limit Test	
	Fstimat	ed EB Amount	\$232 Violation Final Penalty Total	\$188
	250140			
		Th	is violation Final Assessed Penalty (adjusted for limits)	\$188

	E	conomic	Benefit	Wor	rksheet		
Respondent	OXY USA WTP	LP					
Case ID No.							
Reg. Ent. Reference No.							
Media Violation No.	Air					Percent Interest	Years of Depreciation
7.0.00.01.110.						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		zato noquii ou					22 /
Item Description							
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)	\$1,250	5-Apr-2019	19-Dec-2022	3.71	\$232	n/a	\$232
Notes for DELAYED costs	(\$250/final re	ecord). The Date	Required is the dat	date the e of cor	e first final record npliance.	095, 392097, 39210 was due and the Fi	nal Date is the
Avoided Costs	ANNU/	ALIZE avoided c	osts before er			one-time avoided	
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		\$1,250			TOTAL		\$232

	Screening Date Respondent		<u>.</u> P	Docket	<b>No.</b> 2023-0864-AIR-E	Policy Rev	PCW vision 5 (January 28, 2021)
_	Case ID No.	64273					Revision February 11, 2021
Reg.	Ent. Reference No. Media						
	Enf. Coordinator		,				
	<b>Violation Number</b>	4					
	Rule Cite(s)	30 Tex. Admin		.6(b), PBR Registrat Safety Code § 382.	ion No. 170054, and Tex. 085(b)	Health &	
	Violation Description	6,776.00 lbs of	VOC as fugit	ive emissions, durin	cifically, the Respondent r g an emissions event (Inc d lasted 23 hours and 59	<mark>ident No.</mark>	
					Base	e Penalty	\$25,000
>> En	vironmental, Prope	rty and Hum		Matrix			
	Release	Major	<b>Harm</b> Moderate	Minor			
OR	Actual	. rajor	rioderate	X			
	Potential				<b>Percent</b> 15.0%		
>>Pro	grammatic Matrix						
, ,	Falsification	Major	Moderate	Minor			
					Percent 0.0%		
	Human health	or the environm	ent has heer	exposed to insignif	icant amounts of pollutant	s that did	
	Matrix		otective of h	•	ronmental receptors as a		
					Adjustment	\$21,250	
					Aujustinent	Ψ21,230	
							\$3,750
Violati	ion Events						
	Number of \	iolation Events	1	1	Number of violation (	days	
		daily weekly monthly quarterly semiannual annual single event	Х		Violation Base	e Penalty	\$3,750
			One monthly	vevent is recommer	ded.		
Good	Faith Efforts to Com		25.0%			Reduction	\$937
		Be Extraordinary	efore NOE/NOV	NOE/NOV to EDPRP/Se	ttlement Offer		
		Ordinary	Х				
		N/A	Λ				
		Notes	•	•	corrective measures by ne NOE dated June 13,		
					Violation	Subtotal	\$2,813
Econo	mic Benefit (EB) for	this violation	on		Statutory Limit	Test	
	ì	_		¢Ω	-	_	#2.012
	Estimate	ed EB Amount		\$0	Violation Final Pena	iity rotai	\$2,813
			This vio	lation Final Assess	sed Penalty (adjusted fo	or limits)	\$2,813

	Е	conomic	Benefit	Woı	rksheet		
Respondent	OXY USA WTP	' LP					
Case ID No.	64273						
Reg. Ent. Reference No.	RN110408671						
Media		•					Years of
Violation No.						<b>Percent Interest</b>	Depreciation
						5.0	15
	<b>Item Cost</b>	<b>Date Required</b>	<b>Final Date</b>	Yrs	<b>Interest Saved</b>	Costs Saved	<b>EB Amount</b>
Item Description							
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  Avoided Costs	ANNU				efit in Violation No.	1.	d 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		\$0			TOTAL		\$0

	Е	conomic	Benefit	Woı	rksheet		
Respondent		' LP					
Case ID No.	64273						
Reg. Ent. Reference No.	RN110408671						
Media							Years of
Violation No.						<b>Percent Interest</b>	Depreciation
Violation ito:	<u> </u>					5.0	-
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
rem bescription							
Delayed Costs							
Equipment		1		0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction		i		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  Avoided Costs	ANNII				efit in Violation No.	2. one-time avoide	d costs)
Disposal	ANNO	ALIZE avoided Co	osts before er	0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0 \$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance		i		0.00	\$0	\$0	\$0
ONE-TIME avoided costs		İ		0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$0			TOTAL		\$0

Screening Date	10-Jul-2023	Docket No. 202	3-0864-AIR-E	PCW
-	OXY USA WTP LP		Policy R	evision 5 (January 28, 2021)
Case ID No.			PCW	Revision February 11, 2021
Reg. Ent. Reference No.				
Media				
Enf. Coordinator				
Violation Number				
Rule Cite(s)	30 Tex. Admin. Code § 10	1.201(c) and Tex. Health & S.	afety Code § 382.085(b)	
		. (:,)	, 5 (.,	
	Failed to submit a final rec	ord for a reportable emissions	s event no later than two	
\ \	weeks after the end of t	he emissions event. Specifica		
Violation Description		ue by November 10, 2020, bu		
		December 19, 2022.		
			Base Penalty	\$25,000
>> Environmental, Prope	rty and Uuman Uaalti	Matrix		
>> Environmental, Prope	Harm	I Matrix		
Release		Minor		
OR Actual				
Potential		Per	<b>cent</b> 0.0%	
>>Programmatic Matrix				
Falsification	Major Moderate	Minor		
			cent 1.0%	
	1			
Matrix				
Notes	Less than 30% of the	e rule requirements were not	met.	
		Adjust	ment \$24,750	
		Aujusti	ψ24,750	
				\$250
<b>Violation Events</b>				
Violation Events				
Number of \	Violation Events 1	<b>769</b> Nun	nber of violation days	
		7		
	daily			
	weekly monthly	-		
	quarterly		Violation Base Penalty	\$250
	semiannual	1	,	Ψ=00
	annual			
	single event x			
	One single	event is recommended.		
	-			
Cood Foith Effects 1				+60
<b>Good Faith Efforts to Com</b>	ply 25.0%  Before NOE/NOV		Reduction	\$62
	Extraordinary Extraordinary		. <del></del> .	
	Ordinary x			
	N/A			
		dent completed the corrective	e measures on	
	· · · · · · · · · · · · · · · · · · ·	19, 2022, prior to the NOE da		
		2023.		
			Violation Subtotal	\$188
			•	1-39
Economic Benefit (EB) for	r this violation	Sta	itutory Limit Test	
Estimate	ed EB Amount	\$0 Viola	tion Final Penalty Total	\$188
I and the second				
		lation Final Assessed Pena	المراجعة المسالم	\$188

	E	conomic	Benefit	Woı	rksheet		
Respondent	OXY USA WTP	LP					
Case ID No.	64273						
Reg. Ent. Reference No.	RN110408671						
Media Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	15
	<b>Item Cost</b>	<b>Date Required</b>	<b>Final Date</b>	Yrs	<b>Interest Saved</b>	Costs Saved	EB Amount
Item Description							
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					efit in Violation No.		
Avoided Costs	ANNU	ALIZE avoided c	osts before er			one-time avoided	d 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		\$0			TOTAL		\$0

	Screening Date		<b>Docket No.</b> 2023-0864-AIR-E	PCW
	Case ID No.	OXY USA WTP LP		Revision 5 (January 28, 2021) W Revision February 11, 2021
Reg.	Ent. Reference No.		PCI	W Revision February 11, 2021
	Media			
	Enf. Coordinator			
	Violation Number			a
	Rule Cite(s)	30 Tex. Admin. Co	ode § 106.6(b), PBR Registration No. 170054, and Tex. Health & Safety Code § 382.085(b)	
	Violation Description	5,929.00 lbs of V0	unauthorized emissions. Specifically, the Respondent released OC as fugitive emissions, during an emissions event (Incident No. urred on January 11, 2020 and lasted 23 hours and 59 minutes.	
			Base Penalty	\$25,000
>> Env	vironmental, Prope			
	Release		Harm loderate Minor	
OR	Actual	riajoi r	X	
	Potential		Percent 15.0%	
>> Dro	grammatic Matrix			
//PIU	Falsification	Major M	loderate Minor	
			Percent 0.0%	
				i
			t has been exposed to insignificant amounts of pollutants that did ective of human health or environmental receptors as a result of	
	Notes Notes	eveis that are prote	the violation.	
				_
			Adjustment \$21,250	
				\$3,750
Violeti.	an Franks			
violatio	on Events			
	Number of \	iolation Events	1 Number of violation days	
		daily		
		weekly		
		monthly	x	
		quarterly	Violation Base Penalty	\$3,750
		semiannual annual		
		single event		
				7
		Or	ne monthly event is recommended.	
Good F	aith Efforts to Com	nlv	25.0% Reduction	\$937
	a.t and to com	Befor	e NOE/NOV NOE/NOV to EDPRP/Settlement Offer	Ψ337
		Extraordinary		
		Ordinary	X	
		N/A	ne Respondent completed the corrective measures by	
			November 15, 2022, prior to the NOE dated June 9,	
			2023.	
			Violation Subtotal	\$2,813
Econom	nic Ronofit (ED) for	thic violeties		,=,==
COUDL	nic Benefit (EB) for	uns violation	Statutory Limit Test	
	Estimate	ed EB Amount	\$0 Violation Final Penalty Total	\$2,813
			This violation Final Assessed Penalty (adjusted for limits)	\$2,813

	Е	conomic	Benefit	Woı	rksheet		
Respondent	OXY USA WTP	' LP					
Case ID No.	64273						
Reg. Ent. Reference No.	RN110408671						
Media							Years of
Violation No.						<b>Percent Interest</b>	Depreciation
- 1212-212-1 1121						5.0	15
	<b>Item Cost</b>	<b>Date Required</b>	<b>Final Date</b>	Yrs	<b>Interest Saved</b>	Costs Saved	EB Amount
Item Description							
•							
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  Avoided Costs	ANNU				efit in Violation No.	1. one-time avoided	d 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		\$0			TOTAL		\$0

	Screening Date Respondent	10-Jul-2023 OXY USA WTP LP	Docket No. 2023-0864-AIR-E	<b>PCW</b> evision 5 (January 28, 2021)
Dog	Case ID No.	64273	•	/ Revision February 11, 2021
Reg.	Ent. Reference No. Media	Air		
	Enf. Coordinator			
	Violation Number	8		1
	Rule Cite(s)	30 Tex. Admin. Cod	le § 101.201(a)(1)(B) and Tex. Health & Safety Code § 382.085(b)	
	Violation Description	24 hours after the one of the control of the contro	al notification for a reportable emissions event no later than discovery of an emissions event. Specifically, the initial to No. 392095 was due by January 12, 2020 at 12:00 a.m., submitted until December 19, 2022 at 1:08 p.m.	
			Base Penalty	\$25,000
>> Env	vironmental, Prope	rty and Human Hea Harn		
	Release	Major Modera	te Minor	
OR	Actual			
	Potential		Percent 0.0%	
>>Prog	grammatic Matrix	Maiau Madaua	Min au	
	Falsification	Major Modera		
			X Percent 1.0%	
	Matrix Notes	Less than 30%	of the rule requirements were met.	
			Adjustment \$24,750	
				1050
				\$250
Violatio	on Events			
Violatio		/iolation Events 1	1072 Number of violation days	
		daily weekly monthly quarterly semiannual	Violation Base Penalty	\$250
		annual		
		single event x		
		One sir	ngle event is recommended.	
Good F	aith Efforts to Com	nly 25	0% Reduction	\$62
good F	aith Efforts to Com		NOV NOE/NOV to EDPRP/Settlement Offer  Reduction	\$02
		Extraordinary	NOV NOL/NOV to EBINI/Settlement one	
		Ordinary x		
		N/A		
			spondent completed the corrective measures on	
			nber 19, 2022, prior to the NOE dated June 9, 2023.	
			Violation Subtotal	\$188
Econon	nic Benefit (EB) for	this violation	Statutory Limit Test	
	Fetimate	ed EB Amount	\$0 Violation Final Penalty Total	\$188
	Latiniate	Ja ED AIIIVUIIL	Ψο Ψισιατίστι i mai Feriaity Total	<b>\$100</b>
		This	violation Final Assessed Penalty (adjusted for limits)	\$188

	E	conomic	Benefit	Woı	rksheet		
Respondent	OXY USA WTF	· LP					
Case ID No.							
Reg. Ent. Reference No.							
Media		-					Years of
Violation No.						Percent Interest	Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	<b>Final Date</b>	Yrs	<b>Interest Saved</b>	<b>Costs Saved</b>	<b>EB Amount</b>
Item Description							
•							
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					efit in Violation No.		
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	item (except for	one-time avoide	d 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		\$0			TOTAL		\$0

	Screening Date	10-Jul-2023		Doc	ket No.	2023-0864-AIR-E		PCW
	Respondent		_P				Policy R	evision 5 (January 28, 2021)
	Case ID No.						PCW	/ Revision February 11, 2021
Reg.	Ent. Reference No.							
	Media							
	Enf. Coordinator		′					
	Violation Number							1
	Rule Cite(s)		- C-d- C 10	1 201(a) and T	ملط مصالا	0 Cafata Cada C 20	2 005/5)	
		30 Tex. Admi	n. Code § 10	1.201(c) and 1	ex. Health	& Safety Code § 38	2.085(D)	
		Failed to subr	nit a final rec	ord for a repor	table emiss	sions event no later	than two	
	Violation Description				•	cifically, the final red		
	Violation Description	Incident No.	392095 was (			, but was not submit	tted until	
				December	19, 2022.			
						Bas	se Penalty	\$25,000
>> Env	ironmental, Prope	rty and Hum		<b>Matrix</b>				
	Release	Major	<b>Harm</b> Moderate	Minor				
OR	Actual		Moderate	1411101				
	Potential					Percent 0.0%		
						01070	ı	
>>Pro	grammatic Matrix							
	Falsification	Major	Moderate	Minor			•	
				X		Percent 1.0%		
								1
	Matrix		200/ - 5 - 1-					
	Notes	Less tha	in 30% of the	rule requirem	ents were	not met.		
					Adi	justment	\$24,750	
					•		, , , ,	
								\$250
Violatio	on Events							
Violatio	DII EVEIILS							
	Number of \	/iolation Events	1		1059	Number of violation	days	
							·	
		daily						
		weekly						
		monthly						
		quarterly				Violation Bas	se Penalty	\$250
		semiannual annual						
		single event	Х					
		Single event		1				
			0					
			One single	event is recom	menaea.			
_		_		7				
Good F	aith Efforts to Com		25.0%		200	. 000	Reduction	\$62
		B. Extraordinary	erore NOE/NOV	NOE/NOV to EDF	rkr/Settleme	nt Offer		
		•						
		Ordinary	X					
		N/A	The Deeper	<u>                                     </u>	d	akina maaaanna an	1	
		Notes	•	•		ective measures on OE dated June 9,		
		ivotes	December		or to the No 023.	or dated Julie 9,		
		L						
						Violatio	n Subtotal	\$188
_							•	
Econon	nic Benefit (EB) for	this violation	on			<b>Statutory Limi</b>	t Test	
	Fstimate	ed EB Amount		\$0	•	/iolation Final Pen	alty Total	\$188
	25011140						_	
			This vio	lation Final A	ssessed P	enalty (adjusted	for limits)	\$188

	Е	conomic	Benefit	Woı	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	64273						
Media Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	<b>Costs Saved</b>	EB Amount
Item Description							
Delayed Costs		1		7	T		10
Equipment				0.00	\$0	\$0 \$0	\$0
Buildings Other (as needed)		-		0.00	\$0 \$0	\$0 \$0	\$0 \$0
Engineering/Construction				0.00	\$0	\$0 \$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	ANNII				efit in Violation No.	3.  one-time avoided	Logata
Avoided Costs Disposal	ANNO	ALIZE avoided C	osts belole el	0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0 \$0	\$0 \$0
Inspection/Reporting/Sampling				0.00	\$0	\$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		\$0			TOTAL		\$0

	Screening Date	10-Jul-2023		Docket No.	2023-0864-AIR-E		PCW
	Respondent		_P			Policy R	evision 5 (January 28, 2021)
	Case ID No.	64273				PCW	Revision February 11, 2021
Reg.	<b>Ent. Reference No.</b>	RN110408671					
_	Media	Air					
	<b>Enf. Coordinator</b>	Yuliya Dunaway	/				
	<b>Violation Number</b>						
	Rule Cite(s)	20 Tay Admain	. C-d- 5 10C	C(b) DDD Dagistustian N	No. 170054 and Tox		
		30 Tex. Admir	i. Code § 106	.6(b), PBR Registration N Safety Code § 382.085(		неакп &	
				Salety Code 3 302.003(	.0)		
		Eailad ta prov	ont unauthor	rized emissions. Specific	ally the Respondent r	olopcod	
		11 959 00 lbc /		itive emissions, during a	• •		
	<b>Violation Description</b>		_	on September 12, 2020 a	•		
				minutes.			
					Page	Penalty	\$25,000
					Dase	Penanty	\$23,000
>> Env	vironmental, Prope	rtv and Hum	nan Health	Matrix			
	, , ,		Harm				
	Release	Major	Moderate	Minor			
OR	Actual		X				
	Potential				<b>Percent</b> 25.0%		
D							
>>Pro	grammatic Matrix Falsification	Major	Moderate	Minor			
	Faisiilcation	Majoi	Moderate	MIIIOI	Percent 0.0%		
					0.070		
	Matrix			en exposed to significant			
	Notes not exceed i	eveis that are p		uman health or environn the violation.	nentai receptors as a i	result of	
				the violation.			
				A -3	E	#10.7F0	
				Ad	justment	\$18,750	
							\$6,250
Violation	on Events						
	N. I. C.	,,,, e . l			<b>1</b> N 1 6 1 1 1		
	Number of N	/iolation Events	1		Number of violation of	aays	
		daily					
		weekly	X				
		monthly	^				
		quarterly			Violation Base	Penalty	\$6,250
		semiannual				, ,	70/-00
		annual					
		single event					
			One weekly	event is recommended.			
Good F	aith Efforts to Com	ınlv	25.0%			Reduction	\$1,562
200u 1	artii Elioita to coll			NOE/NOV to EDPRP/Settleme		Caaction	Ψ1/302
		Extraordinary		, , , , , , , , , , , , , , , , , , , ,	1		
		Ordinary			1		
		N/A	A		4		
		. •/ / (	The Respon	dent completed the corre	ective measures by		
		Notes		$^{\circ}$ 15, 2022, prior to the N			
				2023.	,		
		l					
					Violation	Subtotal	\$4,688
-		. 4.1. 2. 4. 4. 4. 4. 4. 4. 4. 4. 4. 4. 4. 4. 4.			Ct-1		
Econor	nic Benefit (EB) for	this violati	on		Statutory Limit	lest	
	Fetimate	ed EB Amount		\$0	Violation Final Pena	ilty Total	\$4,688
	_5			<u> </u>		,	Ψ 1,000
			This vio	lation Final Assessed I	Penalty (adjusted fo	or limits)	\$4,688

	Е	conomic	Benefit	Woı	rksheet		
Respondent	OXY USA WTF	LP					
Case ID No.	64273						
Reg. Ent. Reference No.	RN110408671						
Media		•					Years of
Violation No.						<b>Percent Interest</b>	Depreciation
Violation No.	10					5.0	15
	Item Cost	Date Required	Final Date	Yrs	<b>Interest Saved</b>	Costs Saved	EB Amount
Item Description		·					
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 Other (as needed)				0.00	\$0 \$0	n/a n/a	\$0 \$0
Notes for DELAYED costs		:	See the Econor	nic Bene	efit in Violation No.	1.	
Avoided Costs	ANNU	ALIZE avoided co	osts before er	tering	item (except for	one-time avoide	d 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		\$0			TOTAL		\$0

	E	conomic	Benefit	Woı	rksheet		
Respondent	OXY USA WTF	· LP					
Case ID No.							
Reg. Ent. Reference No.							
Media Violation No.	Air					Percent Interest	Years of Depreciation
7.0.00.011.101						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Itom Description	Item Cost	Date Required	Tillal Date	113	Interest Saveu	Costs Saveu	LD Alliount
Item Description							
D-1 1 Ct-							
Delayed Costs		11 11		1 0 00	1 40	l +0 l	40
Equipment Buildings				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0 \$0	\$0 \$0
Engineering/Construction				0.00	\$0	\$0 \$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					efit in Violation No.		
Avoided Costs	ANNU	ALIZE avoided co	osts before en	tering	item (except for	one-time avoided	d 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 \$0	\$0 \$0
Other (as needed)  Notes for AVOIDED costs		JI II		<u>JI 0.00</u>	1 \$0	<u> </u>	\$U
Approx. Cost of Compliance		\$0			TOTAL		\$0

	Screening Date	10-Jul-2023		Dock	<b>et No.</b> 2023-0864-AIR-E		PCW
	Respondent		_P			Policy R	evision 5 (January 28, 2021)
	Case ID No.					PCW	Revision February 11, 2021
Reg. Ent.	Reference No.						
_	Media						
E	nf. Coordinator		/				
	Violation Number Rule Cite(s)						
	Rule Cite(s)	30 Tex. Admi	n. Code § 10:	1.201(c) and Tex	. Health & Safety Code § 382.	085(b)	
				-	ole emissions event no later th		
Vio	lation Description				nt. Specifically, the final recor 26, 2020, but was not submitt		
		Tricident No. 3	92097 Was uu	December 19		.eu unui	
				2 00020.	,		
					Base	Penalty	\$25,000
>> Enviro	nmental, Prope	rty and Hum	nan Health	Matrix			
			Harm				
0.5	Release	Major	Moderate	Minor			
OR	Actual				Barcant 0.00/		
	Potential				Percent 0.0%		
>>Program	nmatic Matrix						
	Falsification	Major	Moderate	Minor			
				X	Percent 1.0%		
Ma	ıtrix	l occ tha	n 200/ of the	rulo roquiromon	ta wara not mot		
No	otes	Less tha	in 30% of the	rule requiremen	ts were not met.		
					Adjustment	\$24,750	
						1	\$250
							,
<b>Violation E</b>	vents						
Violation E		Violation Events	1		814 Number of violation da	ays	
Violation E		Violation Events	1		814 Number of violation da	ays	
Violation E		daily	1		814 Number of violation da	ays	
Violation E		daily weekly	1		814 Number of violation d	ays	
Violation E		daily weekly monthly	1			·	¢250
Violation E		daily weekly monthly quarterly	1		814 Number of violation do  Violation Base	·	\$250
Violation E		daily weekly monthly	1			·	\$250
Violation E		daily weekly monthly quarterly semiannual	1 X			·	\$250
Violation E		daily weekly monthly quarterly semiannual annual				·	\$250
Violation E		daily weekly monthly quarterly semiannual annual	X	event is recomm	Violation Base	·	\$250
	Number of \	daily weekly monthly quarterly semiannual annual single event	X One single		Violation Base	Penalty	
		daily weekly monthly quarterly semiannual annual single event	x One single	event is recomm	Violation Base ended.	·	\$250 \$62
	Number of \	daily weekly monthly quarterly semiannual annual single event	X One single 25.0% efore NOE/NOV	event is recomm	Violation Base ended.	Penalty	
	Number of \	daily weekly monthly quarterly semiannual annual single event	X One single 25.0% efore NOE/NOV	event is recomm	Violation Base ended.	Penalty	
	Number of \	daily weekly monthly quarterly semiannual annual single event	X One single 25.0% efore NOE/NOV	event is recomm	Violation Base ended.	Penalty	
	Number of \	daily weekly monthly quarterly semiannual annual single event  aply  Extraordinary Ordinary	X One single 25.0% efore NOE/NOV	event is recomm	Violation Base ended.	Penalty	
	Number of \	daily weekly monthly quarterly semiannual annual single event  aply  Extraordinary Ordinary	X One single  25.0% efore NOE/NOV  X The Respon	NOE/NOV to EDPRI	ended.  Ref: Settlement Offer  the corrective measures on to the NOE dated June 9,	Penalty	
	Number of \	daily weekly monthly quarterly semiannual annual single event	X One single  25.0% efore NOE/NOV  X The Respon	event is recomm  NOE/NOV to EDPRE	ended.  Ref: Settlement Offer  the corrective measures on to the NOE dated June 9,	Penalty	
	Number of \	daily weekly monthly quarterly semiannual annual single event	X One single  25.0% efore NOE/NOV  X The Respon	NOE/NOV to EDPRI	ended.  Ref: Settlement Offer  the corrective measures on to the NOE dated June 9,	Penalty Eduction	
<b>Good Faith</b>	Number of \	daily weekly monthly quarterly semiannual annual single event   B Extraordinary Ordinary N/A Notes	x One single  25.0% efore NOE/NOV  x The Respondence December	NOE/NOV to EDPRI	ended.  Ref: Settlement Offer  he corrective measures on to the NOE dated June 9, 3.  Violation S	Penalty Eduction	\$62
<b>Good Faith</b>	Number of \	daily weekly monthly quarterly semiannual annual single event   B Extraordinary Ordinary N/A Notes	x One single  25.0% efore NOE/NOV  x The Respondence December	NOE/NOV to EDPRI	ended.  Registration Base  P/Settlement Offer  the corrective measures on to the NOE dated June 9, 3.	Penalty Eduction	\$62
<b>Good Faith</b>	Number of N	daily weekly monthly quarterly semiannual annual single event   B Extraordinary Ordinary N/A Notes	x One single  25.0% efore NOE/NOV  x The Respondence December	NOE/NOV to EDPRI	ended.  Ref: Settlement Offer  he corrective measures on to the NOE dated June 9, 3.  Violation S	Penalty Eduction Eduction	\$62

	E	conomic	Benefit	Wor	ksheet		
Respondent	OXY USA WTP	LP					
Case ID No.	64273						
Reg. Ent. Reference No.	RN110408671						
Media Violation No.						Percent Interest	Years of Depreciation
						5.0	15
	<b>Item Cost</b>	<b>Date Required</b>	<b>Final Date</b>	Yrs	<b>Interest Saved</b>	Costs Saved	<b>EB Amount</b>
Item Description							
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 Other (as needed)				0.00	\$0 \$0	n/a n/a	\$0 \$0
Notes for DELAYED costs					efit in Violation No.		
Avoided Costs	ANNU	ALIZE avoided co	osts before en			one-time avoided	
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 \$0	\$0
Other (as needed)  Notes for AVOIDED costs		JI II		0.00	1 \$0	<b>\$</b> U	\$0
Approx. Cost of Compliance		\$0			TOTAL		\$0

	Screening Date		_	Dock	<b>et No.</b> 2023-0864-AIR-E		PCW
	Respondent Case ID No.		Р				evision 5 (January 28, 2021)
Rea.	Ent. Reference No.					PCW	Revision February 11, 2021
	Media						
	<b>Enf. Coordinator</b>						
	Violation Number						
	Rule Cite(s)	30 Tex. Admin	. Code § 106	.6(b), PBR Regis Safety Code § 3	tration No. 170054, and Tex. 82.085(b)	Health &	
	Violation Description	5,438.00 lbs of	VOC as fugit	tive emissions, d	Specifically, the Respondent of uring an emissions event (Inc.) and lasted 23 hours and 59	ident No.	
					Base	e Penalty	\$25,000
>> En	vironmental, Prope	rty and Hum		Matrix			
	Release	Major	<b>Harm</b> Moderate	Minor			
OR	Actual	Мајог	Moderate	X			
	Potential				Percent 15.0%		
>>Pro	ogrammatic Matrix Falsification	Major	Moderate	Minor			
	Taisineación	Major	Houciate	MINO	Percent 0.0%		
	Matrix				gnificant amounts of pollutan		
	Notes not exceed I	evels that are pr		uman health or o the violation.	environmental receptors as a	result of	
					A diversion and	¢21.250	
					Adjustment	\$21,250	
							\$3,750
Violati	ion Events						
	Number of \	iolation Events	1		1 Number of violation	days	
		daily weekly monthly quarterly semiannual annual single event	X		Violation Base	e Penalty	\$3,750
			One monthly	/ event is recom	mended.		
Good I	Faith Efforts to Com	ply	25.0%			Reduction	\$937
		The state of the s	fore NOE/NOV	NOE/NOV to EDPR	P/Settlement Offer		
		Extraordinary					
		Ordinary N/A	Х				
		Notes			the corrective measures by to the NOE dated June 28, 23.		
		_			Violation	Subtotal	\$2,813
Econo	mic Benefit (EB) for	this violation	on		Statutory Limit	Test	
	Estimate	ed EB Amount		\$0	Violation Final Pena	alty Total	\$2,813
			This vio	lation Final Ass	sessed Penalty (adjusted fo	or limits)	\$2,813

	Е	conomic	Benefit	Woı	rksheet		
Respondent	OXY USA WTP	LP					
Case ID No.	64273						
Reg. Ent. Reference No.	RN110408671						
Media							Years of
Violation No.						Percent Interest	Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	<b>Costs Saved</b>	<b>EB Amount</b>
Item Description							
Delayed Costs		-ur		7			
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 Remediation/Disposal				0.00	\$0 \$0	n/a n/a	\$0 \$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs					efit in Violation No.		
Avoided Costs	ANNU	ALIZE avoided co	osts before er			one-time avoide	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0	\$0
Supplies/Equipment				0.00	\$0 #0	\$0 #0	\$0 ¢0
Financial Assurance ONE-TIME avoided costs				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0 \$0	\$0
Notes for AVOIDED costs		<u> </u>		<u> </u>	η ψυ	ΨΟ	<b>30</b>
Approx. Cost of Compliance		\$0			TOTAL		\$0

Economic Benefit Worksheet							
Respondent	OXY USA WTP	' LP					
Case ID No.	64273						
Reg. Ent. Reference No.	RN110408671						
Media							Years of
Violation No.						<b>Percent Interest</b>	Depreciation
	_ :					5.0	15
	<b>Item Cost</b>	Date Required	Final Date	Yrs	<b>Interest Saved</b>	Costs Saved	EB Amount
Item Description							
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  Avoided Costs	ANNU				efit in Violation No.	2. one-time avoide	d 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		\$0			TOTAL		\$0

	Screening Date	10-Jul-2023		Do	<b>cket No.</b> 2023-0864-AIR-E		PCW
	Respondent	OXY USA WTP L	_P			Policy R	Revision 5 (January 28, 2021)
	Case ID No.	64273				PCV	V Revision February 11, 2021
Reg.	Ent. Reference No.	RN110408671					
	Media	Air					
	<b>Enf. Coordinator</b>	Yuliya Dunaway	/				
	<b>Violation Number</b>						
	Rule Cite(s)						
		30 Tex. Admi	n. Code § 10:	$1.201(c)$ and $^{\circ}$	Tex. Health & Safety Code § 382	.085(b)	
				1.6			
				•	rtable emissions event no later t		
	<b>Violation Description</b>				event. Specifically, the final reco ary 4, 2021, but was not submitt		
		micident No.	392104 Was (	December		eu untii	
				December	13, 2022.		
					Base	<b>Penalty</b>	\$25,000
_							
>> Env	vironmental, Prope	rty and Hum		Matrix			
	Release	Maias	Harm Moderate	Minor			
OR	<b>Release</b> Actual		Moderate	Minor			
OK	Potential				Percent 0.0%		
	rotential				Percent 0.0%		
>>Pro	grammatic Matrix						
// I I O	Falsification	Major	Moderate	Minor			
				Х	Percent 1.0%		
	Matrix	Less tha	n 30% of the	rule requiren	nents were not met.		
	Notes						
					Adjustment	\$24,750	
							\$250
Violatio	on Events						
Violatio	on Events						
	Number of \	/iolation Events	1		683 Number of violation	davs	
			-	J <u>L</u>		,-	
		daily					
		weekly					
		monthly					
		quarterly			Violation Base	<b>Penalty</b>	\$250
		semiannual					
		annual					
		single event	Х				
							1
			One single	event is recor	nmended.		
			J				
Good F	aith Efforts to Com		25.0%	NOE /NO:		Reduction	\$62
				NUE/NUV to ED	PRP/Settlement Offer		
		Extraordinary					
		Ordinary	Х				
		N/A					
			·	•	ed the corrective measures on		
		Notes	December		or to the NOE dated June 28,		
				4	2023.		
					Violation	Subtotal	\$188
Fconor	nic Benefit (EB) for	this violation	on		Statutory Limit		\$100
LCOHOL	inc beliefit (EB) 101	tins violation	UII		Statutory Limit	1631	
	Estimate	ed EB Amount		\$0	Violation Final Pena	alty Total	\$188
			This viol	ation Final A	Assessed Penalty (adjusted for	or limits)	\$188

Economic Benefit Worksheet							
Respondent Case ID No.		LP					
Reg. Ent. Reference No.  Media  Violation No.	Air					Percent Interest	Years of Depreciation
Violation No.	13					5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		·					
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 Other (as needed)				0.00	\$0 \$0	n/a n/a	\$0 \$0
Notes for DELAYED costs			See the Econor	nic Bene	efit in Violation No.	. 3.	
Avoided Costs	ANNU	ALIZE avoided c	osts before er	ntering	item (except for	one-time avoided	l 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		\$0			TOTAL		\$0

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 CN600125827, RN110408671, Rating Year 2023 which includes Compliance History (CH) components from September 1, 2018, through August 31, 2023.

Customer, Respondent, CN600125827, OXY USA WTP LP Classification: SATISFACTORY Rating: 2.17

or Owner/Operator:

Regulated Entity: RN110408671, CHEVRON MINERALS 7 Classification: HIGH Rating: 0.00

BATTERY

Complexity Points: 1 Repeat Violator: NO

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

**Location:** APPROXIMATELY 4,675 FEET WEST OF THE TIPTON ROAD AND WEATHERBY ROAD INTERSECTION IN REEVES

COUNTY, TEXAS

TCEQ Region: REGION 07 - MIDLAND

ID Number(s):

**AIR NEW SOURCE PERMITS REGISTRATION 170054** 

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

Date Compliance History Report Prepared: February 08, 2024

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: February 08, 2019 to February 08, 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:

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: 11/09/2021 (1860598)

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

N/A

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN § BEFORE THE
ENFORCEMENT ACTION §
CONCERNING § TEXAS COMMISSION ON
OXY USA WTP LP §
RN110408671 § ENVIRONMENTAL QUALITY

### AGREED ORDER DOCKET NO. 2023-0864-AIR-E

### I. JURISDICTION AND STIPULATIONS

On	, the Texas Commission on Environmental Quality ("the
Commission" or "TCEQ") consi	idered this agreement of the parties, resolving an enforcement
action regarding OXY USA WT	P LP (the "Respondent") under the authority of TEX. HEALTH &
SAFETY CODE ch. 382 and Tex. V	NATER CODE ch. 7. The Executive Director of the TCEQ, through
the Enforcement Division, and	l the Respondent together stipulate that:

- 1. The Respondent owns and operates a sweet natural gas and liquid hydrocarbons processing facility located approximately 4,675 feet west of the Tipton Road and Weatherby Road intersection in Reeves 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 \$19,695 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$15,756 of the penalty and \$3,939 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 Site:
  - a. By November 15, 2022, successfully completed an automation project to shut in production at the Site during times when gas is unable to be sent to the sales line in order to prevent the recurrence of emissions events due to the same or similar causes as Incident Nos. 392094, 392095, 392097, 392102, and 392104; and
  - b. On December 19, 2022, submitted the initial notifications for Incident Nos. 392094, 392095, 392097, 392102, and 392104 and submitted the final records for Incident Nos. 392094, 392095, 392097, 392102, and 392104.

### II. ALLEGATIONS

- 1. During a record review for the Site conducted from December 19, 2022 through May 23, 2023, an investigator documented that the Respondent:
  - a. Failed to prevent unauthorized emissions, in violation of 30 Tex. Admin. Code § 106.6(b), Permit By Rule ("PBR") Registration No. 170054, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent released 13,489.00 pounds ("lbs") of volatile organic compounds ("VOC") as fugitive emissions, during an emissions event (Incident No. 392094) that began on March 20, 2019 and lasted 48 hours.
  - b. 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 Tex. Health & Safety Code § 382.085(b). Specifically, the initial notification for Incident No. 392094 was due by March 21, 2019 at 12:00 a.m., but was not submitted until December 19, 2022 at 1:02 p.m.
  - c. Failed to submit a final record for a reportable emissions event no later than two weeks after the end of the emissions event, in violation of 30 Tex. Admin. Code § 101.201(c) and Tex. Health & Safety Code § 382.085(b). Specifically, the final record for Incident No. 392094 was due by April 5, 2019, but was not submitted until December 19, 2022.
- 2. During a record review the Site conducted from December 19, 2022 through April 27, 2023, an investigator documented that the Respondent:

- a. Failed to prevent unauthorized emissions, in violation of 30 Tex. Admin. Code § 106.6(b), PBR Registration No. 170054, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent released 6,776.00 lbs of VOC as fugitive emissions, during an emissions event (Incident No. 392102) that occurred on October 27, 2020 and lasted 23 hours and 59 minutes.
- b. 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 Tex. Health & Safety Code § 382.085(b). Specifically, the initial notification for Incident No. 392102 was due by October 28, 2020 at 12:00 a.m., but was not submitted until December 19, 2022 at 2:05 p.m.
- c. Failed to submit a final record for a reportable emissions event no later than two weeks after the end of the emissions event, in violation of 30 Tex. Admin. Code § 101.201(c) and Tex. Health & Safety Code § 382.085(b). Specifically, the final record for Incident No. 392102 was due by November 10, 2020, but was not submitted until December 19, 2022.
- 3. During a record review the Site conducted from December 19, 2022 through April 27, 2023, an investigator documented that the Respondent:
  - a. Failed to prevent unauthorized emissions, in violation of 30 Tex. Admin. Code § 106.6(b), PBR Registration No. 170054, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent released 5,929.00 lbs of VOC as fugitive emissions, during an emissions event (Incident No. 392095) that occurred on January 11, 2020 and lasted 23 hours and 59 minutes.
  - b. 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 Tex. Health & Safety Code § 382.085(b). Specifically, the initial notification for Incident No. 392095 was due by January 12, 2020 at 12:00 a.m., but was not submitted until December 19, 2022 at 1:08 p.m.
  - c. Failed to submit a final record for a reportable emissions event no later than two weeks after the end of the emissions event, in violation of 30 Tex. Admin. Code § 101.201(c) and Tex. Health & Safety Code § 382.085(b). Specifically, the final record for Incident No. 392095 was due by January 25, 2020, but was not submitted until December 19, 2022.
- 4. During a record review the Site conducted from December 19, 2022 through April 27, 2023, an investigator documented that the Respondent:
  - a. Failed to prevent unauthorized emissions, in violation of 30 Tex. Admin. Code § 106.6(b), PBR Registration No. 170054, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent released 11,858.00 lbs of VOC as fugitive emissions, during an emissions event (Incident No. 392097) that occurred on September 12, 2020 and lasted 23 hours and 59 minutes.

- b. 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 Tex. Health & Safety Code § 382.085(b). Specifically, the initial notification for Incident No. 392097 was due by September 13, 2020 at 12:00 a.m., but was not submitted until December 19, 2022 at 1:19 p.m.
- c. Failed to submit a final record for a reportable emissions event no later than two weeks after the end of the emissions event, in violation of 30 Tex. Admin. Code § 101.201(c) and Tex. Health & Safety Code § 382.085(b). Specifically, the final record for Incident No. 392097 was due by September 26, 2020, but was not submitted until December 19, 2022.
- 5. During a record review the Site conducted from December 19, 2022 through April 27, 2023, an investigator documented that the Respondent:
  - a. Failed to prevent unauthorized emissions, in violation of 30 Tex. Admin. Code § 106.6(b), PBR Registration No. 170054, and Tex. Health & Safety Code § 382.085(b). Specifically, the Respondent released 5,438.00 lbs of VOC as fugitive emissions, during an emissions event (Incident No. 392104) that occurred on January 21, 2021 and lasted 23 hours and 59 minutes.
  - b. 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 Tex. Health & Safety Code § 382.085(b). Specifically, the initial notification for Incident No. 392104 was due by January 22, 2021 at 12:00 a.m., but was not submitted until December 19, 2022 at 2:18 p.m.
  - c. Failed to submit a final record for a reportable emissions event no later than two weeks after the end of the emissions event, in violation of 30 Tex. Admin. Code § 101.201(c) and Tex. Health & Safety Code § 382.085(b). Specifically, the final record for Incident No. 392104 was due by February 4, 2021, but was not submitted until December 19, 2022.

#### 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: OXY USA WTP LP, Docket No. 2023-0864-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.
- This Order may be executed in separate and multiple counterparts, which together shall 6. 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.

OXY USA WTP LP DOCKET NO. 2023-0864-AIR-E Page 6

#### SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

?	;	,	7
For the Commission		Date	
For the Executive Direct	 or	<u>5/3/2024</u> 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;

OXY USA WTP LP

- 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 Date

Accet D

Name (Printed or typed)

Authorized Representative of

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