

Executive Summary – Enforcement Matter – Case No. 64450
Stakeholder Gas Services, LLC
RN110038213
Docket No. 2023-1039-AIR-E

Order Type:

Findings Agreed Order

Findings Order Justification:

Unauthorized emissions which are excessive emissions events

Media:

AIR

Small Business:

No

Location(s) Where Violation(s) Occurred:

Campo Viejo Gas Processing Plant, located approximately 7.5 miles west of U.S. Highway 82 and County Road 220, Plains, Yoakum County

Type of Operation:

Natural gas plant

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: May 24, 2024

Comments Received: No

Penalty Information

Total Penalty Assessed: \$6,750

Total Paid to General Revenue: \$6,750

Total Due to General Revenue: \$0

Payment Plan: N/A

Compliance History Classifications:

Person/CN - High

Site/RN - High

Major Source: Yes

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: January 2021

Investigation Information

Complaint Date(s): N/A

Complaint Information: N/A

Date(s) of Investigation: March 3, 2023 through June 15, 2023

Date(s) of NOE(s): August 3, 2023

Executive Summary – Enforcement Matter – Case No. 64450
Stakeholder Gas Services, LLC
RN110038213
Docket No. 2023-1039-AIR-E

Violation Information

Failed to prevent unauthorized emissions. The emissions event was determined to be an excessive emissions event [30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 149382, Federal Operating Permit No. O4383/General Operating Permit No. 514, Site-wide Requirements Nos. (b)(2) and (b)(9)(E), and TEX. HEALTH & SAFETY CODE § 382.085(b)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

N/A

Technical Requirements:

The Order will require the Respondent to:

- a. Within 30 days, submit a corrective action plan ("CAP") in accordance with the TCEQ letter dated August 3, 2023 to address the excessive emissions event that began on February 15, 2023 (Incident No. 395590);
- b. Respond completely and adequately, as determined by the Executive Director, to all written requests for information concerning the CAP submittal in connection with the February 15, 2023 excessive emissions event within 15 days after the date of such requests, or by any other deadline specified in writing;
- c. Within 45 days, submit written certification to demonstrate compliance with a.;
- d. Upon Executive Director approval of the CAP, implement the CAP in accordance with the approved schedule; and
- e. Within 15 days after the completion of the CAP implementation, submit written certification to demonstrate compliance with d.

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Johnnie Wu, Enforcement Division, Enforcement Team 2, MC 219, (512) 239-2524; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548

Respondent: Josh Roberts, Chief Operating Officer, Stakeholder Gas Services, LLC, 19026 Ridgewood Parkway, Suite 230, San Antonio, Texas 78259

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

DATES	Assigned	8-Aug-2023			
	PCW	11-Aug-2023	Screening	8-Aug-2023	EPA Due

RESPONDENT/FACILITY INFORMATION					
Respondent	Stakeholder Gas Services, LLC				
Reg. Ent. Ref. No.	RN110038213				
Facility/Site Region	2-Lubbock	Major/Minor Source	Major		

CASE INFORMATION					
Enf./Case ID No.	64450	No. of Violations	1		
Docket No.	2023-1039-AIR-E	Order Type	Findings		
Media Program(s)	Air	Government/Non-Profit	No		
Multi-Media		Enf. Coordinator	Johnnie Wu		
		EC's Team	Enforcement Team 2		
Admin. Penalty \$	Limit Minimum	\$0	Maximum	\$25,000	

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$7,500
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ADJUSTMENTS (+/-) TO SUBTOTAL 1

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

Compliance History	-10.0%	Adjustment	Subtotals 2, 3, & 7	-\$750
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Notes	Reduction for High Performer Classification.			
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Culpability	No	0.0%	Enhancement	Subtotal 4	\$0
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Notes	The Respondent does not meet the culpability criteria.			
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Good Faith Effort to Comply Total Adjustments	Subtotal 5	\$0
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Economic Benefit	0.0%	Enhancement*	Subtotal 6	\$0
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Total EB Amounts	\$567	*Capped at the Total EB \$ Amount
Estimated Cost of Compliance	\$10,000	

SUM OF SUBTOTALS 1-7	Final Subtotal	\$6,750
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OTHER FACTORS AS JUSTICE MAY REQUIRE	0.0%	Adjustment	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes		Final Penalty Amount	\$6,750
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$6,750
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DEFERRAL	0.0%	Reduction	Adjustment	\$0
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Reduces the Final Assessed Penalty by the indicated percentage.

Notes	No deferral is recommended for Findings Orders.
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PAYABLE PENALTY	\$6,750
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Screening Date

8-Aug-2023

Docket No.

2023-1039-AIR-E

PCW

Respondent

Stakeholder Gas Services, LLC

Case ID No.

64450

Reg. Ent. Reference No.

RN110038213

Media

Air

Enf. Coordinator

Johnnie Wu

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>)	0	0%
	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)

High Performer

Adjustment Percentage (Subtotal 7) -10%

>> Compliance History Summary

Compliance History Notes

Reduction for High Performer Classification.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) -10%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% -10%

Screening Date

8-Aug-2023

Docket No.

2023-1039-AIR-E

PCW

Respondent

Stakeholder Gas Services, LLC

Policy Revision 5 (January 28, 2021)

Case ID No.

64450

PCW Revision February 11, 2021

Reg. Ent. Reference No.

RN110038213

Media

Air

Enf. Coordinator

Johnnie Wu

Violation Number

1

Rule Cite(s)

30 Tex. Admin. Code §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 149382, Federal Operating Permit No. 04383/General Operating Permit No. 514, Site-wide Requirements Nos. (b)(2) and (b)(9)(E), and

Violation Description

Failed to prevent unauthorized emissions. Specifically, the Respondent released 10.90 pounds ("lbs") of carbon monoxide, 8.50 lbs of hydrogen sulfide, 1.30 lbs of nitrogen oxides, 782.10 lbs of sulfur dioxide, and 0.40 lb of volatile organic compounds as fugitive emissions, during an emissions event (Incident No. 395590) that began on February 15, 2023 and lasted 4 hours and 38 minutes. The emissions event occurred when the stage level transmitter of the Acid Gas Injection compressor faulted out causing the unexpected shutdown of the compressor. The emissions event was determined to be an excessive emissions event.

Base Penalty

\$25,000

>> Environmental, Property and Human Health Matrix

OR

Release

Major

Moderate

Minor

Actual

x

Potential

Percent

30.0%

>>Programmatic Matrix

Falsification

Major

Moderate

Minor

Percent

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

\$17,500

\$7,500

Violation Events

Number of Violation Events

1

1

Number of violation days

daily

weekly

monthly

x

quarterly

semiannual

annual

single event

Violation Base Penalty

\$7,500

One monthly event is recommended.

Good Faith Efforts to Comply

0.0%

Reduction

\$0

Before NOE/NOV

NOE/NOV to EDPRP/Settlement Offer

Extraordinary

Ordinary

N/A

x

Notes

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

Violation Subtotal

\$7,500

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount

\$567

Violation Final Penalty Total

\$6,750

This violation Final Assessed Penalty (adjusted for limits)

\$6,750

Economic Benefit Worksheet

Respondent Stakeholder Gas Services, LLC
Case ID No. 64450
Reg. Ent. Reference No. RN110038213
Media Air
Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

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

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$10,000	15-Feb-2023	4-Apr-2024	1.13	\$567	n/a	\$567
Notes for DELAYED costs	Estimated cost to implement an approved corrective action plan to address the excessive emissions event that began on February 15, 2023 (Incident No. 395590). The Date Required is the date the emissions event began and the Final Date is the estimated date of compliance.						

Avoided Costs

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

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

Approx. Cost of Compliance	\$10,000	TOTAL	\$567
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Compliance History Report

Compliance History Report for CN605439652, RN110038213, Rating Year 2023 which includes Compliance History (CH) components from September 1, 2018, through August 31, 2023.

Customer, Respondent, or Owner/Operator:	CN605439652, Stakeholder Gas Services, LLC	Classification: HIGH	Rating: 0.00
Regulated Entity:	RN110038213, CAMPO VIEJO GAS PROCESSING PLANT	Classification: HIGH	Rating: 0.00
Complexity Points:	4	Repeat Violator: NO	
CH Group:	03 - Oil and Gas Extraction		
Location:	Approximately 7.5 miles west of United States Highway 82 and County Road 220, near Plains, Yoakum County, Texas		
TCEQ Region:	REGION 02 - LUBBOCK		
ID Number(s):			
AIR OPERATING PERMITS PERMIT 4383	AIR NEW SOURCE PERMITS REGISTRATION 165041		
AIR NEW SOURCE PERMITS REGISTRATION 149382	AIR NEW SOURCE PERMITS AFS NUM 4850100048		
AIR EMISSIONS INVENTORY ACCOUNT NUMBER YAA004D			
Compliance History Period:	September 01, 2018 to August 31, 2023	Rating Year: 2023	Rating Date: 09/01/2023
Date Compliance History Report Prepared:	February 05, 2024		
Agency Decision Requiring Compliance History:	Enforcement		
Component Period Selected:	February 05, 2019 to February 05, 2024		
TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.			
Name: Johnnie Wu	Phone: (512) 239-2524		

Site and Owner/Operator History:

- | | |
|--|-----|
| 1) Has the site been in existence and/or operation for the full five year compliance period? | YES |
| 2) Has there been a (known) change in ownership/operator of the site during the compliance period? | NO |

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

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

N/A

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1	December 12, 2019	(1612762)
Item 2	December 13, 2019	(1612755)
Item 3	January 07, 2020	(1618537)
Item 4	January 31, 2020	(1624138)
Item 5	February 11, 2020	(1624978)
Item 6	February 13, 2020	(1629840)
Item 7	February 14, 2020	(1625020)
Item 8	February 21, 2020	(1631021)
Item 9	April 09, 2020	(1639062)

Item 10	April 22, 2020	(1638308)
Item 11	July 20, 2020	(1663314)
Item 12	July 22, 2020	(1659939)
Item 13	August 25, 2020	(1671510)
Item 14	September 04, 2020	(1659417)
Item 15	September 29, 2020	(1677865)
Item 16	October 13, 2020	(1678230)
Item 17	October 14, 2020	(1678223)
Item 18	October 16, 2020	(1678224)
Item 19	November 05, 2020	(1679126)
Item 20	November 12, 2020	(1679131)
Item 21	November 19, 2020	(1690726)
Item 22	December 03, 2020	(1691371)
Item 23	March 02, 2021	(1702776)
Item 24	March 15, 2021	(1700521)
Item 25	March 17, 2021	(1699460)
Item 26	March 19, 2021	(1700523)
Item 27	March 23, 2021	(1705062)
Item 28	April 01, 2021	(1705499)
Item 29	April 06, 2021	(1707856)
Item 30	April 20, 2021	(1706122)
Item 31	April 27, 2021	(1709226)
Item 32	May 05, 2021	(1706128)
Item 33	June 03, 2021	(1699461)
Item 34	June 08, 2021	(1707789)
Item 35	June 09, 2021	(1708671)
Item 36	June 15, 2021	(1709433)
Item 37	June 29, 2021	(1736587)
Item 38	July 30, 2021	(1736556)
Item 39	August 19, 2021	(1745254)
Item 40	September 23, 2021	(1745816)
Item 41	September 28, 2021	(1745821)
Item 42	October 01, 2021	(1747100)
Item 43	October 06, 2021	(1761674)
Item 44	October 29, 2021	(1770145)
Item 45	January 06, 2022	(1763946)
Item 46	January 13, 2022	(1775707)
Item 47	January 18, 2022	(1775702)
Item 48	April 08, 2022	(1763945)
Item 49	April 12, 2022	(1770714)
Item 50	May 18, 2022	(1816938)
Item 51	June 27, 2022	(1790363)
Item 52	August 22, 2022	(1834462)
Item 53	August 22, 2023	(1834576)
Item 54	November 09, 2023	(1846219)

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:

N/A

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
STAKEHOLDER GAS SERVICES, LLC
RN110038213

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

AGREED ORDER DOCKET NO. 2023-1039-AIR-E

On _____, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Stakeholder Gas Services, 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 presented this Order to the Commission.

The Respondent understands that it has certain procedural rights at certain points in the enforcement process, including the right to formal notice of violations, notice of an evidentiary hearing, the right to an evidentiary hearing, and a right to appeal. By entering into this Order, the Respondent agrees to waive all notice and procedural rights.

It is further understood and agreed that 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. The duties and responsibilities imposed by this Order are binding upon the Respondent.

The Commission makes the following Findings of Fact and Conclusions of Law:

I. FINDINGS OF FACT

1. The Respondent owns and operates a natural gas processing plant located approximately 7.5 miles west of United States Highway 82 and County Road 220, near Plains, Yoakum 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. During a record review for the Plant, conducted from March 3, 2023 through June 15, 2023, an investigator documented that the Respondent released 10.90 pounds ("lbs") of carbon monoxide, 8.50 lbs of hydrogen sulfide, 1.30 lbs of nitrogen oxides, 782.10 lbs of sulfur dioxide, and 0.40 lb of volatile organic compounds as fugitive emissions, during an emissions event (Incident No. 395590) that began on February 15, 2023 and lasted 4 hours and 38 minutes. The emissions event occurred when the stage level transmitter of the Acid Gas Injection compressor faulted out causing the unexpected shutdown of the compressor, resulting in the release to the atmosphere. TCEQ staff determined that the emissions event was an excessive emissions event.

II. CONCLUSIONS OF LAW

1. As evidenced by Finding of Fact No. 1, the Respondent is subject to the jurisdiction of the TCEQ pursuant to TEX. HEALTH & SAFETY CODE ch. 382 and the rules of the TCEQ.
2. As evidenced by Finding of Fact No. 2, the Respondent failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 149382, Federal Operating Permit No. O4383/General Operating Permit No. 514, Site-wide Requirements Nos. (b)(2) and (b)(9)(E), and TEX. HEALTH & SAFETY CODE § 382.085(b). The emissions event was determined to be an excessive emissions event.
3. Pursuant to TEX. WATER CODE § 7.051, the TCEQ has the authority to assess an administrative penalty against the Respondent for violations of state statutes within the TCEQ's jurisdiction, for violations of rules adopted under such statutes, or for violations of orders or permits issued under such statutes.
4. An administrative penalty in the amount of \$6,750 is justified by the facts recited in this Order, and considered in light of the factors set forth in TEX. WATER CODE § 7.053. The Respondent paid the \$6,750 penalty.

III. ORDERING PROVISIONS

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

1. The Respondent is assessed a penalty as set forth in Conclusion of Law No. 4 for violations of state statutes and rules of the TCEQ. The payment of this penalty and the Respondent's compliance with all the requirements set forth in this Order resolve only the matters set forth by this Order in this action. The Commission shall not be constrained in any manner from requiring corrective actions or penalties for violations that are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: Stakeholder Gas Services, LLC, Docket No. 2023-1039-AIR-E" to:

Financial Administration Division, Revenue Operations Section
Attention: Cashier's Office, MC 214
Texas Commission on Environmental Quality
P.O. Box 13088
Austin, Texas 78711-3088
2. The Respondent shall undertake the following technical requirements at the Plant:
 - a. Within 30 days after the effective date of this Order, submit a corrective action plan ("CAP") in accordance with the TCEQ letter dated August 3, 2023 to address the excessive emissions event that began on February 15, 2023 (Incident No. 395590).
 - b. Respond completely and adequately, as determined by the Executive Director, to all written requests for information concerning the CAP submittal in connection

with the February 15, 2023 excessive emissions event within 15 days after the date of such requests, or by any other deadline specified in writing.

- c. Within 45 days after the effective date of this Order, submit written certification, as described in Ordering Provision No. 2.e, to demonstrate compliance with Ordering Provision No. 2.a.
- d. Upon Executive Director approval of the CAP, implement the CAP in accordance with the approved schedule.
- e. Within 15 days after the completion of the CAP implementation, submit written certification, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.d. The certification shall be signed by the Respondent and shall include the following certification language:

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

The certification shall be submitted to:

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

with a copy to:

Air Section Manager
Lubbock Regional Office
Texas Commission on Environmental Quality
5012 50th Street, Suite 100
Lubbock, Texas 79414-3426

- 3. All relief not expressly granted in this Order is denied.
- 4. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Plant operations referenced in this Order.
- 5. If the Respondent fails to comply with any of the Ordering Provisions in this Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, the Respondent's failure to comply is not a violation of

this Order. The Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. The Respondent shall notify the Executive Director within seven days after the Respondent becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.

6. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Enforcement Division at the address listed above.
7. 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 in this Order.
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. 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.
10. 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.
11. 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

6/11/2024

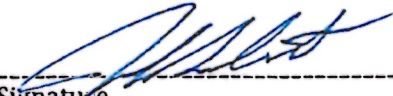
Date

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

4/17/2024

Date

Josh Roberts

Chief Operating Officer

Name (Printed or typed)
Authorized Representative of
Stakeholder Gas Services, LLC

Title

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

19122 US Hwy 281 N., Ste 113
San Antonio, TX 78258

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.