Executive Summary – Enforcement Matter – Case No. 64540 Capital Star Oil and Gas, Inc. RN100218833 Docket No. 2023-1085-AIR-E

Order Type: 1660 Agreed Order **Findings Order Justification:** N/A Media: AIR **Small Business:** No Location(s) Where Violation(s) Occurred: North Word Gas Plant, 867 West Fairwinds Street, Hallettsville, Lavaca County **Type of Operation:** Natural gas processing 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: \$41,650 Amount Deferred for Expedited Settlement: \$8,330 Total Paid to General Revenue: \$8,320 Total Due to General Revenue: \$25,000 Payment Plan: 5 payments of \$5,000 each 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: July 24, 2023 through July 25, 2023 Date(s) of NOE(s): August 1, 2023

Executive Summary – Enforcement Matter – Case No. 64540 Capital Star Oil and Gas, Inc. RN100218833 Docket No. 2023-1085-AIR-E

Violation Information

1. Failed to submit a deviation report no later than 30 days after the end of each reporting period. Specifically, the deviation report for the May 3, 2022 through November 2, 2022 reporting period was due by December 2, 2022, but was not submitted until December 12, 2022. Additionally, the deviation report for the November 3, 2022 through May 2, 2023 reporting period was due by June 1, 2023, but was not submitted until June 7, 2023 [30 Tex. ADMIN. CODE §§ 122.143(4) and 122.145(2)(C), Federal Operating Permit ("FOP") No. O108, General Terms and Conditions ("GTC"), and Tex. HEALTH & SAFETY CODE § 382.085(b)].

2. Failed to submit a permit compliance certification ("PCC") within 30 days of any certification period. Specifically, the PCC for the May 3, 2022 through May 2, 2023 certification period was due by June 1, 2023, but was not submitted until June 7, 2023 [30 TEX. ADMIN. CODE §§ 122.143(4) and 122.146(2), FOP No. 0108, GTC and Special Terms and Conditions ("STC") No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

3. Failed to submit a signed certification of accuracy and completeness. Specifically, the signed certification of accuracy and completeness, Form OP-CRO1, that was submitted with the PCC for the May 3, 2022 through May 2, 2023 certification period on June 7, 2023 was not signed by the Responsible Official [30 TEX. ADMIN. CODE §§ 122.143(4), 122.146(1), and 122.165(a)(8), FOP No. O108, GTC, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

4. Failed to report all instances of deviations. Specifically, the deviation report for the May 3, 2022 through November 2, 2022 reporting period did not include the deviations for failing to report five non-reportable emissions events. Additionally, the deviation report for the November 3, 2022 through May 2, 2023 reporting period did not include the deviation for failing to submit the deviation report for the May 3, 2022 through November 2, 2022 reporting period no later than 30 days after the end of the reporting period [30 TEX. ADMIN. CODE §§ 122.143(4) and 122.145(2)(A), FOP No. 0108, GTC, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

5. Failed to create a final record for all reportable and non-reportable emissions events no later than two weeks after the end of an emissions event. Specifically, the final records for five non-reportable emissions events were not created for the emissions from a pressure relief valve on the North Word's Amine Contractor Column, a partially opened valve connected to a hose that was leaking volatile organic compounds ("VOC") laden water from the Glycol Knockout Tank, the emissions from the valves and thief hatches on the Oil Skimmer Tank and its associated produced water tanks, the emissions from a pressure relief valve on the Bullet Tank, and the emissions from a valve on the Bullet Tank that were discovered by TCEQ staff during an investigation conducted on July 13, 2022 [30 TEX. ADMIN. CODE §§ 101.201(b) and 122.143(4), FOP No. O108, GTC and STC No. 2.F., and TEX. HEALTH & SAFETY CODE § 382.085(b)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

The Respondent implemented the following corrective measures:

a. On December 12, 2022, submitted the deviation report for the May 3, 2022 through November 2, 2022 reporting period;

b. On June 7, 2023, submitted the deviation report for the November 3, 2022 through May 2, 2023 reporting period and the PCC for the May 3, 2022 through May 2, 2023 certification period;

c. By July 19, 2023, submitted the signed certification of accuracy and completeness, Form OP-CRO1, with the PCC for the May 3, 2022 through May 2, 2023 certification period;

d. By August 30, 2023, implemented procedures in order to ensure that the deviation reports, PCCs, and signed certifications of accuracy and completeness (Form OP-CRO1) are submitted in a timely manner and implemented procedures in order to ensure that the final records for non-reportable emissions events are created in a timely manner;

e. By February 21, 2024, created the final records for the five non-reportable emissions events for the emissions from a pressure relief valve on the North Word's Amine Contractor Column, a partially opened valve connected to a hose that was leaking VOC laden water from the Glycol Knockout Tank, the emissions from the valves and thief hatches on the Oil Skimmer Tank and its associated produced water tanks, the emissions from a pressure relief valve on the Bullet Tank, and the emissions from a valve on the Bullet Tank that were discovered by the TCEQ staff during an investigation conducted on July 13, 2022;

f. By February 27, 2024, submitted the revised deviation report for the May 3, 2022 through November 2, 2022 reporting period to report the deviations for failing to create the final records for five non-reportable emissions events no later than two weeks after the end of the emissions events; and

g. By February 27, 2024, submitted the revised deviation report for the November 3, 2022 through May 2, 2023 reporting period to report the deviations for failing to submit the deviation report for the May 3, 2022 through November 2, 2022 reporting period no later than 30 days after the end of the reporting period.

Technical Requirements:

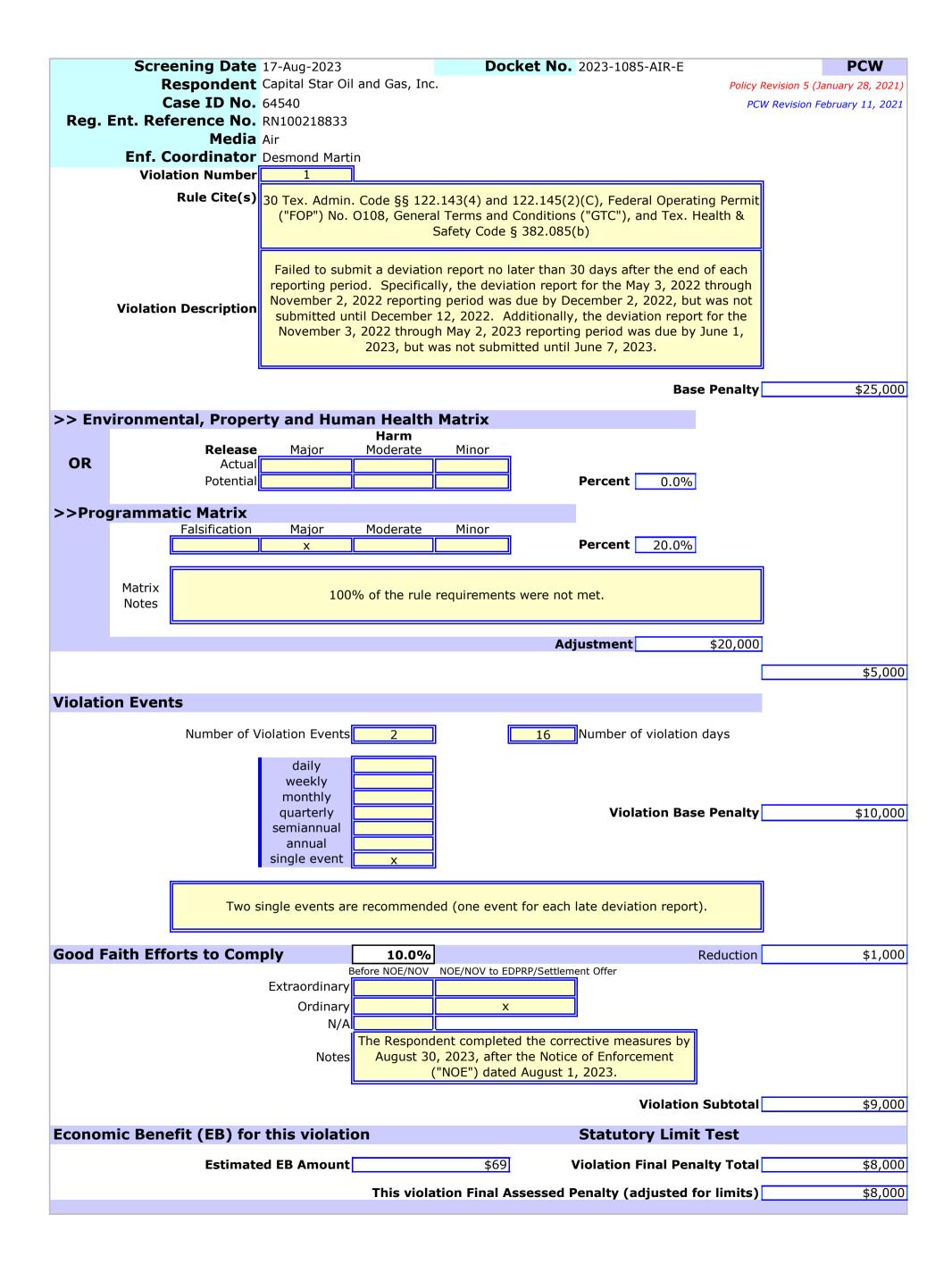
N/A

Contact Information

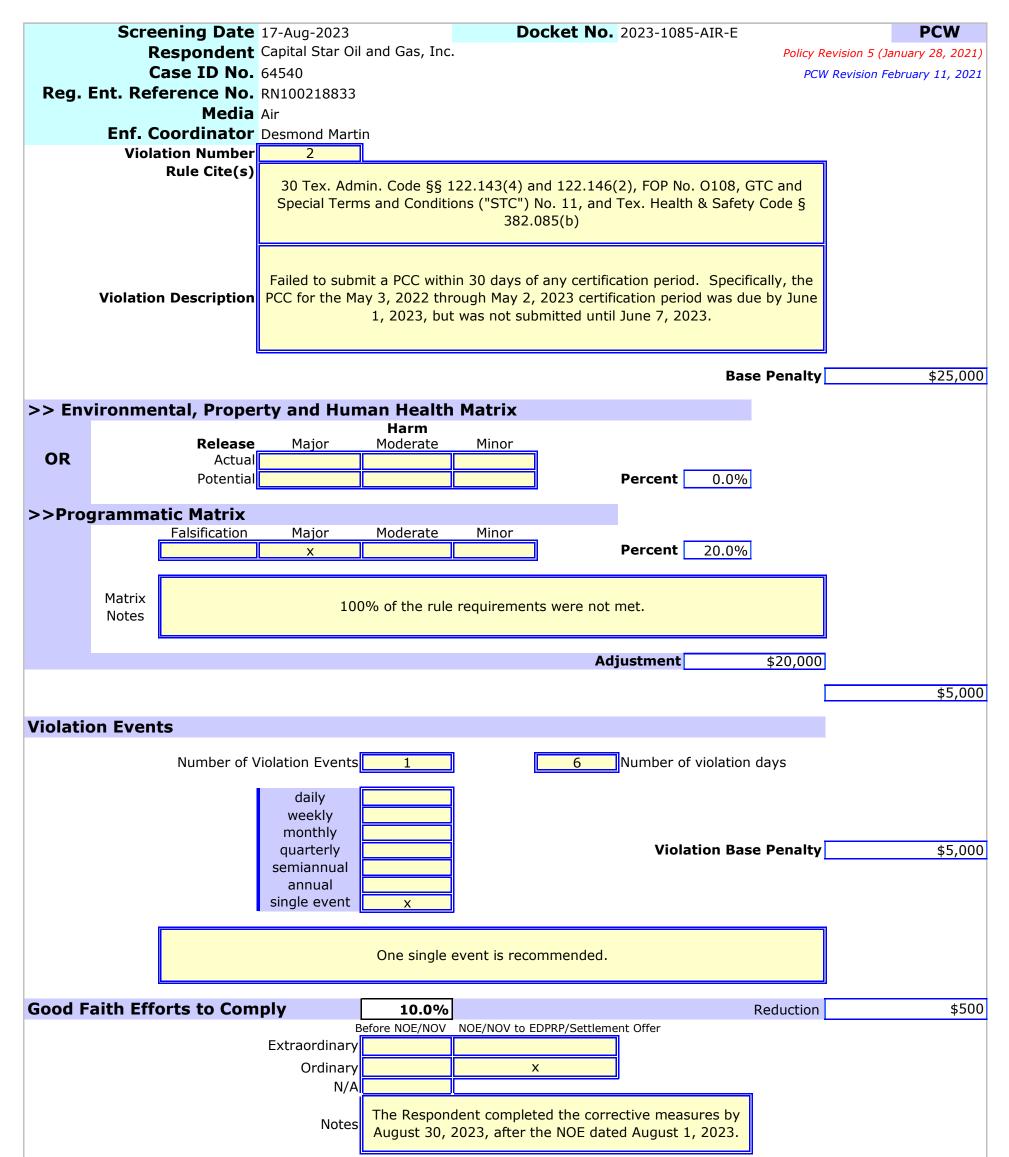
TCEQ Attorney: N/A TCEQ Enforcement Coordinator: Desmond Martin, Enforcement Division, Enforcement Team 2, MC 219, (512) 239-2814; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548 **Respondent:** Thomas Wygant, Vice President, Capital Star Oil and Gas, Inc., 4400 Post Oak Parkway, Suite 23690, Houston, Texas 77027-3421 Ryan Ignasiak, Compliance Manager, Capital Star Oil and Gas, Inc., 4400 Post Oak Parkway, Suite 23690, Houston, Texas 77027-3421 **Respondent's Attorney:** N/A

Policy R	Pe	enalty Calcula	tion Works	heet (PC	,	vision February 11, 2021
DATES Assigne PC	d 8-Aug-2023 V 15-Apr-2024	Screening 17-Aug-2	023 EPA Due		1	
RESPONDENT/FACI					,	
Responder	t Capital Star Oil					
Reg. Ent. Ref. No Facility/Site Regio		ti	Major/I	Minor Source	Major	
CASE INFORMATION	I					
Enf./Case ID No Docket No	64540 2023-1085-AIR	.F	No.	of Violations Order Type		
Media Program(s	s) Air	<u> </u>		t/Non-Profit	No	
Multi-Med	a		Enf.		Desmond Mart Enforcement T	
Admin. Penalty	Limit Minimum	\$0 Maximur	n \$25,000			
		Penalty Calc	ulation Secti	on		
TOTAL BASE PEN	ALTY (Sum of	violation base pe			Subtotal 1	\$48,500
ADJUSTMENTS (+/-) TO SUBT	OTAL 1				
	obtained by multiplyin	g the Total Base Penalty (Sub	total 1) by the indicated provide the second s		tals 2, 3, & 7	-\$4,850
Note		eduction for High Perfo				÷ ,
NOL	:5 r					
Culpability	No	0	.0% Enhancement		Subtotal 4	\$0
Note	es The Re	espondent does not mee	t the culpability crit	eria.		
Good Faith E	ffort to Comply 1	otal Adjustments			Subtotal 5	-\$2,000
Economic Be	nofit	0	0 0/		Subtotal 6	¢0
	Total EB Amounts ed Cost of Compliance	\$282 *	. 0% Enhancement* Capped at the Total EB \$	Amount	Sublolaro	\$0
		\$5,750				
SUM OF SUBTOT	ALS 1-7			F	inal Subtotal	\$41,650
OTHER FACTORS			0.0%		Adjustment	\$0
Reduces or enhances the Fi	hal Subtotal by the indi	cated percentage.			1	
Notes						
				Final Per	nalty Amount	\$41,650
STATUTORY LIM	IT ADJUSTME	NT		Final Asse	ssed Penalty	\$41,650
DEEEDDAL						
DEFERRAL Reduces the Final Assessed	Penalty by the indicate	d percentage.	20.0%	Reduction	Adjustment	-\$8,330
Notes		Deferral offered for exp	edited settlement			
PAYABLE PENAL						

	Screen	ing Date 17-Aug-2023 Docket No. 2023-1085-AIR-E		PCW
		pondent Capital Star Oil and Gas, Inc.		sion 5 (January 28, 2021)
Per		e ID No. 64540 ence No. RN100218833	PCW Re	evision February 11, 2023
Neg	g. Ent. Keren	Media Air		
	Enf. Coo	ordinator Desmond Martin		
		Compliance History Worksheet		
>> Co	-	bry Site Enhancement (Subtotal 2)	Normala a r	A
	Component	Number of Written notices of violation ("NOVs") with same or similar violations as those in the	Number	Adjust.
	NOVs	current enforcement action (number of NOVs meeting criteria)	0	0%
		Other written NOVs	0	0%
		Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	0	0%
	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	0	0%
	Judgments and Consent	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%
	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	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 (number of audits for which notices were submitted)	0	0%
	Addits	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%
		Environmental management systems in place for one year or more	No	0%
	Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Other	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 Per	centage (Sub	ototal 2) 0%
>> Re	epeat Violator ((Subtotal 3)		
	No	Adjustment Per	centage (Sub	ototal 3) 0%
>> Co	mpliance Histo	ory Person Classification (Subtotal 7)		
	High Perf	ormer Adjustment Per	rcentage (Sub	ototal 7) -10%
>> Co	mpliance Histo	ory Summary		
	Compliance History Notes	Reduction for High Performer Classification.		
S S F !		Total Compliance History Adjustment Percentage (Subtotals 2,	3, & 7) -10%
>> FINA	ai compliance	History Adjustment Final Adjustment Percent	age *capped	at 100% -10%

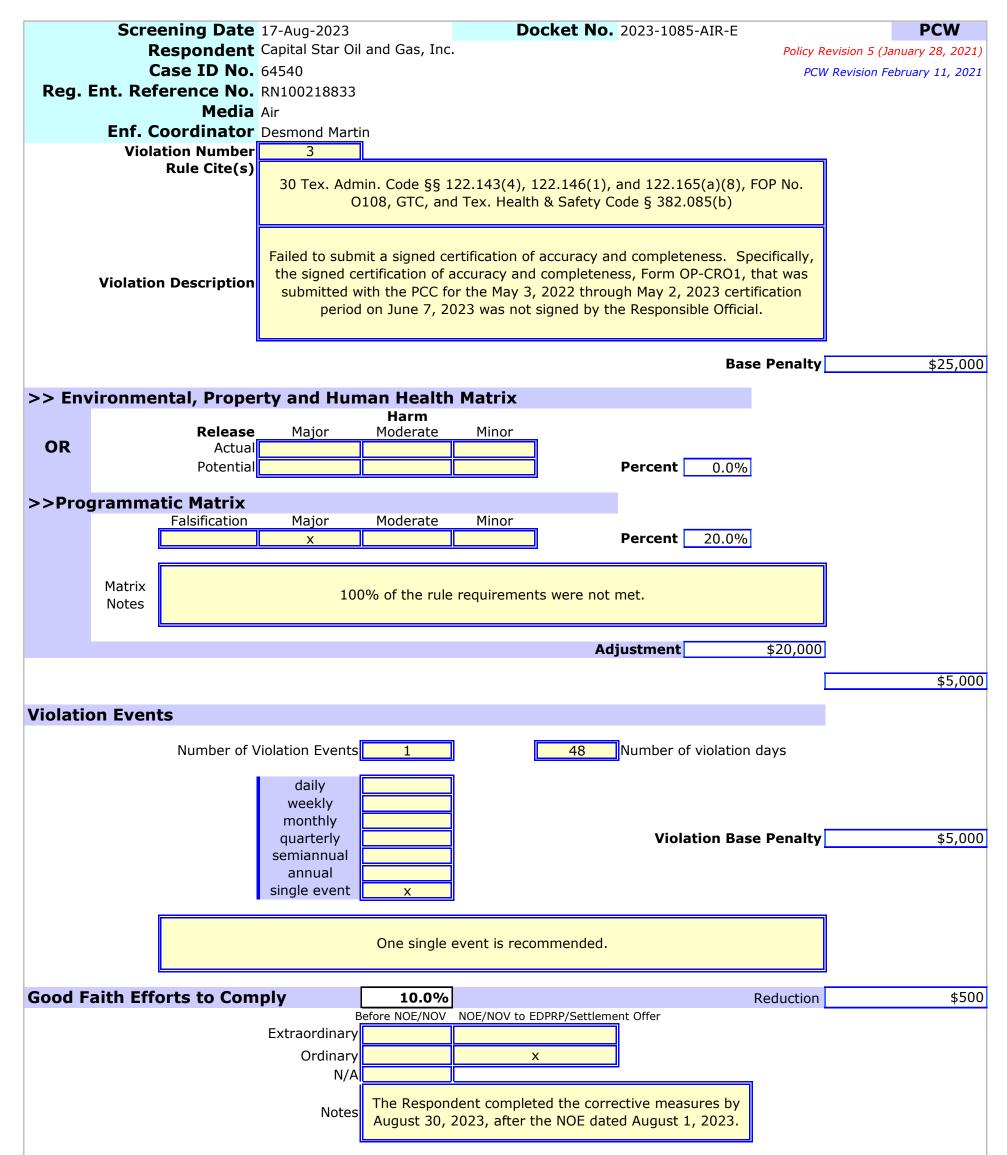


	E	conomic	Benefit		rksneet		
Respondent Case ID No. Leg. Ent. Reference No.	64540	-					
Media Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs		1			+ 0	±0	±0
Equipment				0.00	\$0 #0	<u>\$0</u> \$0	\$0 \$0
Buildings Other (as needed)				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Engineering/Construction				0.00	\$0	\$0 \$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0 \$0	n/a	\$0
Training/Sampling	\$1,500	2-Dec-2022	30-Aug-2023	0.74	\$56	n/a	\$56
				0.00	\$0	n/a	\$0
Remediation/Disposal Permit Costs				0.00	\$0	n/a	\$0
Remediation/Disposal			•	0.00 0.51 orts for	\$0 \$13 the May 3, 2022 t	n/a n/a hrough November	\$0 \$13 2, 2022 and
Remediation/Disposal Permit Costs	Estimated November 3, order to certifications	costs to submit th 2022 through Ma ensure that the c of accuracy and c	he deviation rep ay 2, 2023 repor deviation reports completeness (F	0.00 0.51 orts for ting per , permit orm OP	\$0 \$13 the May 3, 2022 t riods (\$250/report t compliance certifi -CRO1) are submit port was due and	n/a n/a	\$0 \$13 2, 2022 and t procedures in and signed nner (\$1,500).
Remediation/Disposal Permit Costs Other (as needed)	Estimated November 3, order to certifications The Dates	costs to submit th 2022 through Ma ensure that the c of accuracy and c Required is the da	he deviation rep ay 2, 2023 repor leviation reports completeness (F ate the first devi	0.00 0.51 orts for ting per , permit orm OP ation re complia	\$0 \$13 the May 3, 2022 t riods (\$250/report t compliance certifi -CRO1) are submit port was due and ance.	n/a n/a hrough November) and to implement ications ("PCCs"), a ited in a timely ma	\$0 \$13 2, 2022 and t procedures in and signed nner (\$1,500). the dates of
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs	Estimated November 3, order to certifications The Dates	costs to submit th 2022 through Ma ensure that the c of accuracy and c Required is the da	he deviation rep ay 2, 2023 repor leviation reports completeness (F ate the first devi	0.00 0.51 orts for ting per , permit orm OP ation re complia	\$0 \$13 the May 3, 2022 t riods (\$250/report t compliance certifi -CRO1) are submit port was due and ance.	n/a n/a hrough November) and to implement ications ("PCCs"), a ted in a timely ma the Final Dates are	\$0 \$13 2, 2022 and t procedures in and signed nner (\$1,500). the dates of
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated November 3, order to certifications The Dates	costs to submit th 2022 through Ma ensure that the c of accuracy and c Required is the da	he deviation rep ay 2, 2023 repor leviation reports completeness (F ate the first devi	0.00 0.51 orts for ting per , permit orm OP ation re complia	\$0 \$13 the May 3, 2022 t riods (\$250/report t compliance certifi- CRO1) are submit port was due and ance. item (except for	n/a n/a hrough November) and to implement ications ("PCCs"), a the final Dates are the Final Dates are one-time avoide \$0 \$0	\$0 \$13 2, 2022 and t procedures in and signed nner (\$1,500). the dates of ad costs) \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated November 3, order to certifications The Dates	costs to submit th 2022 through Ma ensure that the c of accuracy and c Required is the da	he deviation rep ay 2, 2023 repor leviation reports completeness (F ate the first devi	0.00 0.51 orts for ting per , permit orm OP ation re complia tering 0.00 0.00	\$0 \$13 the May 3, 2022 t riods (\$250/report t compliance certifi- CRO1) are submit port was due and ance. item (except for \$0 \$0 \$0 \$0 \$0	n/a n/a hrough November) and to implement ications ("PCCs"), a the final Dates are the Final Dates are one-time avoide \$0 \$0 \$0	\$0 \$13 2, 2022 and t procedures in and signed nner (\$1,500). the dates of d costs) \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	Estimated November 3, order to certifications The Dates	costs to submit th 2022 through Ma ensure that the c of accuracy and c Required is the da	he deviation rep ay 2, 2023 repor leviation reports completeness (F ate the first devi	0.00 0.51 orts for ting per , permit orm OP ation re complia tering 0.00 0.00 0.00	\$0 \$13 the May 3, 2022 t riods (\$250/report t compliance certifi- CRO1) are submit port was due and ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a hrough November) and to implement ications ("PCCs"), a ited in a timely ma the Final Dates are one-time avoide \$0 \$0 \$0 \$0 \$0	\$0 \$13 2, 2022 and t procedures in and signed nner (\$1,500). the dates of d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated November 3, order to certifications The Dates	costs to submit th 2022 through Ma ensure that the c of accuracy and c Required is the da	he deviation rep ay 2, 2023 repor leviation reports completeness (F ate the first devi	0.00 0.51 orts for ting permit orm OP ation re complia tering 0.00 0.00 0.00 0.00	\$0 \$13 the May 3, 2022 t riods (\$250/report t compliance certifi- CRO1) are submit port was due and so ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a hrough November) and to implement ications ("PCCs"), a ited in a timely ma the Final Dates are one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$13 2, 2022 and t procedures in and signed nner (\$1,500). the dates of d costs) 30 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated November 3, order to certifications The Dates	costs to submit th 2022 through Ma ensure that the c of accuracy and c Required is the da	he deviation rep ay 2, 2023 repor leviation reports completeness (F ate the first devi	0.00 0.51 orts for ting permit orm OP ation re complia tering 0.00 0.00 0.00 0.00 0.00	\$0 \$13 the May 3, 2022 t riods (\$250/report t compliance certifi- CRO1) are submit port was due and the port was due and the port was due and the submit port was due and the submit port was due and the submit	n/a n/a hrough November) and to implement ications ("PCCs"), a ited in a timely ma the Final Dates are one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$13 2, 2022 and t procedures in and signed nner (\$1,500). the dates of d costs) 30 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated November 3, order to certifications The Dates	costs to submit th 2022 through Ma ensure that the c of accuracy and c Required is the da	he deviation rep ay 2, 2023 repor leviation reports completeness (F ate the first devi	0.00 0.51 orts for ting permit orm OP ation re complia tering 0.00 0.00 0.00 0.00	\$0 \$13 the May 3, 2022 t riods (\$250/report t compliance certifi- CRO1) are submit port was due and so ance. item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a hrough November) and to implement ications ("PCCs"), a ited in a timely ma the Final Dates are one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$13 2, 2022 and t procedures in and signed nner (\$1,500). the dates of d costs) 30 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated November 3, order to certifications The Dates	costs to submit th 2022 through Ma ensure that the c of accuracy and c Required is the da	he deviation rep ay 2, 2023 repor leviation reports completeness (F ate the first devi	0.00 0.51 orts for ting permit orm OP ation re complia tering 0.00 0.00 0.00 0.00 0.00	\$0 \$13 the May 3, 2022 t riods (\$250/report t compliance certifi- CRO1) are submit port was due and the port was due and the port was due and the submit port was due and the submit port was due and the submit	n/a n/a hrough November) and to implement ications ("PCCs"), a ited in a timely ma the Final Dates are one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$13 2, 2022 and t procedures in and signed nner (\$1,500). the dates of d costs) s 0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$



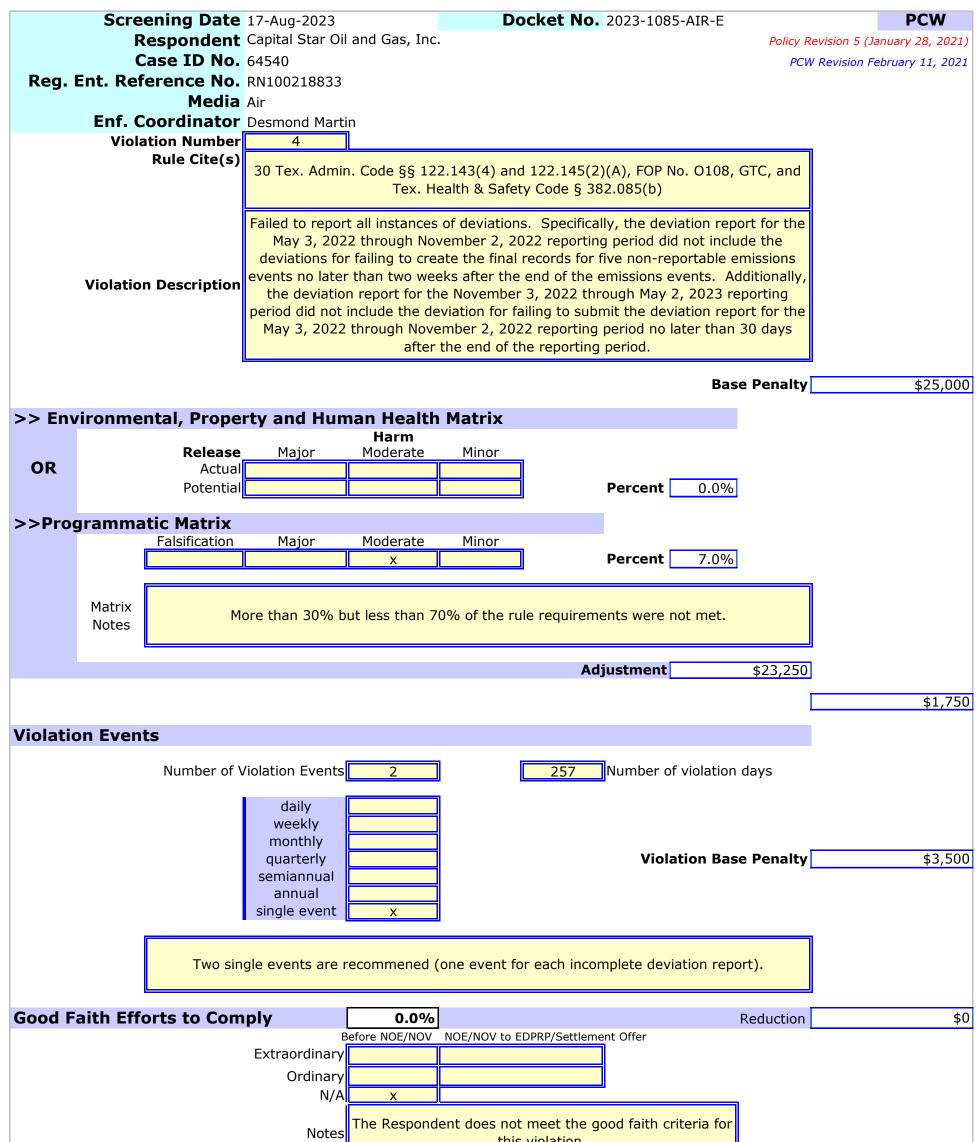
	Violation Subtotal \$4,500
Economic Benefit (EB) for this violation	Statutory Limit Test
Estimated EB Amount	\$0 Violation Final Penalty Total \$4,000
	This violation Final Assessed Penalty (adjusted for limits) \$4,000

	E	conomic	Benefit	Wo	rksheet		
Respondent	Capital Star O	il and Gas, Inc.					
Case ID No.	64540						
Reg. Ent. Reference No.	RN100218833						
Media						Deveent Teteveet	Years of
Violation No.	2					Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Vrc	Interest Saved	Costs Saved	EB Amount
Item Description	Item cost	Date Required	i mai Date	115	Interest Saveu	COSIS Saveu	LD Amount
Item Description							
Deleveral Consta							
Delayed Costs					±0	±0	¢O
Equipment Buildings				0.00	<u>\$0</u> \$0	\$0 \$0	<u>\$0</u> \$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)	\$250	1-Jun-2023	7-Jun-2023	0.02	\$0	n/a	\$0
Notes for DELAYED costs	Re	equired is the date	e the PCC was contacted of the PCC was contacted by the provided of the provid	ue and implen	the Final Date is t	023 certification per he date of complian s in order to ensure	ce.
Avoided Costs	ANNUA	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		\$250			TOTAL		\$0



	Violation Subtotal \$4,500
Economic Benefit (EB) for this violation	n Statutory Limit Test
Estimated EB Amount	\$2 Violation Final Penalty Total \$4,000
	This violation Final Assessed Penalty (adjusted for limits) \$4,000

	E	conomic	Бепент		rksneet		
Respondent Case ID No. Reg. Ent. Reference No.	64540						
Media Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delayed Costs		1			+ 0	±0	
Equipment				0.00	<u>\$0</u> \$0	<u>\$0</u> \$0	\$0 \$0
Buildings Other (as needed)				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Engineering/Construction				0.00	\$0	\$0	\$0
Lingineering, construction Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
				0.00	\$0	n/a	\$0
Remediation/Disposal Permit Costs				0.00	\$0	n/a	\$0
Remediation/Disposal			-	0.00 0.13 on of ac	\$0 \$2 ccurary and comple	n/a n/a eteness, Form OP-C	\$0 \$2 CRO1, with the
Remediation/Disposal Permit Costs	Estimated co PCC for the M See the Econd	ost to submit the s lay 3, 2022 throu was omic Benefit in Vic	signed certification gh May 2, 2023 due and the Fin- plation No. 1 for	0.00 0.13 on of ac certifica al Date implem	\$0 \$2 ccurary and comple ation period. The l is the date of com enting procedures	n/a n/a eteness, Form OP-C Date Required is th	\$0 \$2 CRO1, with the e date the PCC that the signed
Remediation/Disposal Permit Costs Other (as needed)	Estimated co PCC for the M See the Econc certificat	ost to submit the s lay 3, 2022 throu was omic Benefit in Vic tions of accuracy a	signed certification gh May 2, 2023 due and the Fina plation No. 1 for and completene	0.00 0.13 on of ac certifica al Date implem ss (Forr	\$0 \$2 ation period. The l is the date of com enting procedures n OP-CRO1) are su	n/a n/a eteness, Form OP-C Date Required is th pliance. in order to ensure	\$0 \$2 CRO1, with the e date the PCC that the signed y manner.
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs	Estimated co PCC for the M See the Econc certificat	ost to submit the s lay 3, 2022 throu was omic Benefit in Vic tions of accuracy a	signed certification gh May 2, 2023 due and the Fina plation No. 1 for and completene	0.00 0.13 on of ac certifica al Date implem ss (Forr tering 0.00	\$0 \$2 curary and complete ation period. The lation period. The late is the date of com enting procedures n OP-CRO1) are su item (except for \$0	n/a n/a eteness, Form OP-C Date Required is th pliance. in order to ensure ubmitted in a timely one-time avoide \$0	\$0 \$2 CRO1, with the e date the PCC that the signed y manner. d costs) \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated co PCC for the M See the Econc certificat	ost to submit the s lay 3, 2022 throu was omic Benefit in Vic tions of accuracy a	signed certification gh May 2, 2023 due and the Fina plation No. 1 for and completene	0.00 0.13 on of ac certifica al Date implem ss (Forr tering 0.00 0.00	\$0 \$2 curary and complete ation period. The lation period. The lation is the date of com enting procedures n OP-CRO1) are su item (except for \$0 \$0	n/a n/a eteness, Form OP-C Date Required is th pliance. in order to ensure ubmitted in a timely one-time avoide \$0 \$0	\$0 \$2 CRO1, with the e date the PCC that the signed y manner. d costs) \$0 \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	Estimated co PCC for the M See the Econc certificat	ost to submit the s lay 3, 2022 throu was omic Benefit in Vic tions of accuracy a	signed certification gh May 2, 2023 due and the Fina plation No. 1 for and completene	0.00 0.13 on of ac certifica al Date implem ss (Forr tering 0.00 0.00	\$0 \$2 curary and complete ation period. The lation period. The lation is the date of complete is the d	n/a n/a eteness, Form OP-C Date Required is th pliance. in order to ensure ubmitted in a timely one-time avoide \$0 \$0 \$0	\$0 \$2 CRO1, with the e date the PCC that the signed y manner. d costs) \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	Estimated co PCC for the M See the Econc certificat	ost to submit the s lay 3, 2022 throu was omic Benefit in Vic tions of accuracy a	signed certification gh May 2, 2023 due and the Fina plation No. 1 for and completene	0.00 0.13 0n of ac certifica al Date implem ss (Forr tering 0.00 0.00 0.00	\$0 \$2 curary and complete ation period. The list he date of com is the date of com enting procedures n OP-CRO1) are su item (except for \$0 \$0 \$0 \$0 \$0	n/a n/a eteness, Form OP-C Date Required is th pliance. in order to ensure ubmitted in a timely one-time avoide \$0 \$0 \$0 \$0	\$0 \$2 CRO1, with the e date the PCC that the signed y manner. d costs) \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated co PCC for the M See the Econc certificat	ost to submit the s lay 3, 2022 throu was omic Benefit in Vic tions of accuracy a	signed certification gh May 2, 2023 due and the Fina plation No. 1 for and completene	0.00 0.13 0.13 0.01 0.01 0.00 0.00 0.00	\$0 \$2 curary and complete ation period. The list he date of complete is the da	n/a n/a eteness, Form OP-C Date Required is th pliance. in order to ensure ubmitted in a timely one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$2 CRO1, with the e date the PCC that the signed y manner. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated co PCC for the M See the Econc certificat	ost to submit the s lay 3, 2022 throu was omic Benefit in Vic tions of accuracy a	signed certification gh May 2, 2023 due and the Fina plation No. 1 for and completene	0.00 0.13 0n of ac certifica al Date implem ss (Forr tering 0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$2 curary and complete ation period. The lease is the date of com- enting procedures n OP-CRO1) are su item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a eteness, Form OP-C Date Required is th pliance. in order to ensure ubmitted in a timely one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$2 CRO1, with the e date the PCC that the signed y manner. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated co PCC for the M See the Econc certificat	ost to submit the s lay 3, 2022 throu was omic Benefit in Vic tions of accuracy a	signed certification gh May 2, 2023 due and the Fina plation No. 1 for and completene	0.00 0.13 0.13 0.01 0.01 0.00 0.00 0.00	\$0 \$2 curary and complete ation period. The list he date of complete is the da	n/a n/a eteness, Form OP-C Date Required is th pliance. in order to ensure ubmitted in a timely one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$2 CRO1, with the e date the PCC that the signed y manner. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Notes for DELAYED costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated co PCC for the M See the Econc certificat	ost to submit the s lay 3, 2022 throu was omic Benefit in Vic tions of accuracy a	signed certification gh May 2, 2023 due and the Fina plation No. 1 for and completene	0.00 0.13 0n of ac certifica al Date implem ss (Forr tering 0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$2 curary and complete ation period. The lease is the date of com- enting procedures n OP-CRO1) are su item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a eteness, Form OP-C Date Required is th pliance. in order to ensure ubmitted in a timely one-time avoide \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$2 CRO1, with the e date the PCC that the signed y manner. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



	this violation.	
	Violation	Subtotal \$3,500
Economic Benefit (EB) for this violation	Statutory Limi	t Test
Estimated EB Amount	\$31 Violation Final Pen	alty Total \$3,150
	This violation Final Assessed Penalty (adjusted f	or limits) \$3,150

	E	conomic	Benefit	Woi	ksheet		
Respondent							
Case ID No.	64540						
Reg. Ent. Reference No.	RN100218833						
Media						Percent Interest	Years of
Violation No.	4					Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Vrs	Interest Saved	Costs Saved	EB Amount
Item Description		Bute Required	i mai bate		Interest suveu		LD 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	+500		27 5 1 2024	0.00	\$0	n/a	\$0
Other (as needed)	\$500	2-Dec-2022	27-Feb-2024	1.24	\$31	n/a	\$31
Notes for DELAYED costs	emissions eve revised dev deviations reporting per	ents no later than iation report for t for failing to sub iod no later than	two weeks afte he November 3, mit the deviation 30 days after th	r the er 2022 t n report e end o	d of the emissions hrough May 2, 202 for the May 3, 20 f the reporting per	records for five nor events (\$250) and 23 reporting period 22 through Novemb iod (\$250). The Da s the date of compli	to submit the to report the per 2, 2022 ate Required is
Avoided Costs	ANNUA	LIZE 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		\$500			TOTAL		\$31

	Scre	ening Date	17-Aug-2023		Do	ocket No.	2023-1085-AI	R-E		PCW
		-	Capital Star Oil	and Gas, Inc.					Policy R	evision 5 (January 28, 2021)
	(Case ID No.	64540						PCW	Revision February 11, 2021
Reg.	Ent. Ref	ference No.	RN100218833							
		Media	Air							
			Desmond Marti	n						
	Viol	ation Number								
		Rule Cite(s)	30 Tex. Admi		• • •	• •), FOP No. O10 de § 382.085(STC No. 2.F.,	
	Violatio	n Description	the emissions produced wat	s after the end issions events d's Amine Cor olatile organic s from the val- er tanks, the m a valve on	d of an emise were not cro ntractor Colu compounds ves and thief emissions fro the Bullet Ta	sions event. eated for the mn, a partial ("VOC") lade f hatches on om a pressure ank that were	Specifically, th emissions from	te final record n a pressure the Glycol Kn er Tank and it n the Bullet T the TCEQ sta	ls for five non- relief valve on to a hose that ockout Tank, ts associated Tank, and the	
									Base Penalty	\$25,000
>> Env	vironme	ental, Prope	rty and Hum		Matrix					
		Release	Major	Harm Moderate	Minor					
OR		Actual								
		Potential					Percent	0.	0%	
						-				
>>Pro	gramma	atic Matrix Falsification	Major	Modorato	Minor					
		Faisincation	Major x	Moderate	Minor		Percent	20	0%	
							Creent	20.	0 /0	
	Matrix Notes			100% of th	ie rule requir	rements were	not met.			
							Adjus	tment	\$20,000	
										\$5,000
		•-								
violati	on Even	ts								
		Number of \	/iolation Events	5		386	Number of viol	ation days		
			daily							
			weekly							
			monthly quarterly					Violation	Base Penalty	\$25,000
			semiannual							4207000
			annual							
			single event	х						
			Five single eve	ents are recor	nmended (or	ne event for e	each missing fi	nal record).		
Good F	aith Eff	orts to Com		0.0% efore NOE/NOV		DPRP/Settlemer	at Offer		Reduction	\$0
			Extraordinary		NOL/NOV LUL	.or Ny Settlemen				
			Ordinary							
			N/A							
			-		ondent door	not meat the	e good faith cri	itoria for thic		
			Notes	nie Kesp	ondent does	violation				

		Violation Subtotal	\$25,000
Economic Benefit (EB) for this violation		Statutory Limit Test	
Estimated EB Amount	\$180	Violation Final Penalty Total	\$22,500
	This violation Fi	nal Assessed Penalty (adjusted for limits)	\$22,500

eg. Ent. Reference No. Media	Air					Percent Interest	Years of
Violation No.	5						Depreciation
						5.0	1.
		Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
Delawad Casta							
Delayed Costs	ir	1			±0	±0	¢0
Equipment				0.00	<u>\$0</u> \$0	<u>\$0</u> \$0	<u>\$0</u> \$0
Buildings Other (as needed)				0.00	\$0 \$0	\$0	<u> </u>
Engineering/Construction				0.00	\$0	\$0	<u> </u>
Lingineering/ construction Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	<u>\$0</u>
Training/Sampling	\$1,500	27-Jul-2022	30-Aug-2023	1.09	\$82	n/a	\$82
Remediation/Disposal				0.00	\$0	n/a	\$0
Kemediation/Disposal							
Permit Costs				0.00	\$0	n/a	\$0
Permit Costs Other (as needed)	from a pre connected to the valves	ssure relief valve a hose that was l and thief hatche	on the North We eaking VOC lade s on the Oil Skin	the five ord's Ar n water	\$0 \$98 non-reportable e nine Contractor Co from the Glycol k ank and its associa	n/a missions events for olumn, a partially op nockout Tank, the ted produced water	\$98 the emissions bened valve emissions fron tanks, the
Permit Costs	Estimated confrom a pre connected to a the valves emissions fr Tank tha (\$250/fina reportable em	sts to create the ssure relief valve a hose that was l and thief hatche om a pressure re t were discovered al record) and to hissions events ar	final records for on the North We eaking VOC lade s on the Oil Skin lief valve on the l by the TCEQ st implement proce e created in a tin	the five ord's Ar n water nmer Ta Bullet aff duri edures i mely ma	\$0 \$98 e non-reportable e nine Contractor Co from the Glycol k ank and its associa Fank, and the emis ng an investigation n order to ensure anner (\$1,500). T	n/a missions events for plumn, a partially op nockout Tank, the e	\$98 the emissions bened valve emissions from tanks, the on the Bullet 13, 2022 ds for non- is the date the
Permit Costs Other (as needed) Notes for DELAYED costs	Estimated confrom a preconnected to a the valves emissions frank tha (\$250/finate reportable emistions frank tha finate the the the the the the the the the t	sts to create the ssure relief valve a hose that was le and thief hatche om a pressure re t were discovered al record) and to hissions events ar al records were du	final records for on the North We eaking VOC lade s on the Oil Skin lief valve on the l by the TCEQ st implement proce e created in a tin ue to be created	the five ord's Ar n water nmer Ta Bullet aff duri edures i mely ma and the	\$0 \$98 e non-reportable e nine Contractor Co from the Glycol k ank and its associa Tank, and the emis ng an investigation n order to ensure anner (\$1,500). T e Final Dates are t	n/a missions events for olumn, a partially op nockout Tank, the e ted produced water ssions from a valve n conducted on July that the final record he Dates Required he dates of complia	\$98 the emissions bened valve emissions from tanks, the on the Bullet 13, 2022 ds for non- is the date the nce.
Permit Costs Other (as needed)	Estimated confrom a preconnected to a the valves emissions frank tha (\$250/finate reportable emistions frank tha finate the the the the the the the the the t	sts to create the ssure relief valve a hose that was le and thief hatche om a pressure re t were discovered al record) and to hissions events ar al records were du	final records for on the North We eaking VOC lade s on the Oil Skin lief valve on the l by the TCEQ st implement proce e created in a til ue to be created osts before en	the five ord's Ar n water nmer Ta Bullet aff duri edures i mely ma and the tering	\$0 \$98 e non-reportable e nine Contractor Co from the Glycol k ank and its associa Tank, and the emis ng an investigation n order to ensure anner (\$1,500). T e Final Dates are t item (except for	n/a missions events for olumn, a partially op nockout Tank, the ted produced water ssions from a valve n conducted on July that the final record The Dates Required he dates of complia	\$98 the emissions bened valve emissions fror tanks, the on the Bullet 13, 2022 ds for non- is the date the nce.
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs	Estimated confrom a preconnected to a the valves emissions frank tha (\$250/finate reportable emistions frank tha finate the the the the the the the the the t	sts to create the ssure relief valve a hose that was le and thief hatche om a pressure re t were discovered al record) and to hissions events ar al records were du	final records for on the North We eaking VOC lade s on the Oil Skin lief valve on the l by the TCEQ st implement proce e created in a til ue to be created osts before en	the five ord's Ar n water nmer Ta Bullet aff duri edures i mely ma and the	\$0 \$98 e non-reportable e nine Contractor Co from the Glycol k ank and its associa Tank, and the emis ng an investigation n order to ensure anner (\$1,500). T e Final Dates are t item (except for	n/a missions events for olumn, a partially op nockout Tank, the e ted produced water ssions from a valve n conducted on July that the final record he Dates Required he dates of complia	\$98 the emissions bened valve emissions from tanks, the on the Bullet 13, 2022 ds for non- is the date the nce.
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated confrom a preconnected to a the valves emissions frank tha (\$250/finate reportable emistions frank tha finate the the the the the the the the the t	sts to create the ssure relief valve a hose that was le and thief hatche om a pressure re t were discovered al record) and to hissions events ar al records were du	final records for on the North We eaking VOC lade s on the Oil Skin lief valve on the l by the TCEQ st implement proce e created in a til ue to be created osts before en	the five ord's Ar n water amer Ta Bullet aff duri edures i and the tering 0.00	\$0 \$98 a non-reportable e nine Contractor Co from the Glycol k ank and its associa Fank, and the emis ng an investigation n order to ensure anner (\$1,500). The Final Dates are to item (except for \$0	n/a missions events for plumn, a partially op nockout Tank, the e ted produced water ssions from a valve n conducted on July that the final record the Dates Required he dates of complia	\$98 the emissions bened valve emissions from tanks, the on the Bullet 13, 2022 ds for non- is the date the nce. d costs)
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated confrom a preconnected to a the valves emissions frank tha (\$250/finate reportable emistions frank tha finate the the the the the the the the the t	sts to create the ssure relief valve a hose that was le and thief hatche om a pressure re t were discovered al record) and to hissions events ar al records were du	final records for on the North We eaking VOC lade s on the Oil Skin lief valve on the l by the TCEQ st implement proce e created in a til ue to be created osts before en	the five ord's Ar n water n water aff duri edures i aff duri and the 0.00 0.00 0.00 0.00	\$0 \$98 non-reportable e nine Contractor Co from the Glycol k ank and its associa rank, and the emis n order to ensure anner (\$1,500). T Final Dates are t item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a missions events for plumn, a partially op inockout Tank, the ted produced water ssions from a valve n conducted on July that the final record the Dates Required he dates of complia one-time avoided \$0 \$0 \$0 \$0	\$98 the emissions pened valve emissions from tanks, the on the Bullet 13, 2022 ds for non- is the date the nce. d costs) \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Notes for DELAYED costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated confrom a preconnected to a the valves emissions frank tha (\$250/finate reportable emistions frank tha finate the the the the the the the the the t	sts to create the ssure relief valve a hose that was le and thief hatche om a pressure re t were discovered al record) and to hissions events ar al records were du	final records for on the North We eaking VOC lade s on the Oil Skin lief valve on the l by the TCEQ st implement proce e created in a til ue to be created osts before en	the five ord's Ar n water n water aff duri edures i aff duri and the 0.00 0.00 0.00 0.00 0.00	\$0 \$98 non-reportable e nine Contractor Co from the Glycol k ank and its associa fank, and the emis n order to ensure anner (\$1,500). T e Final Dates are t item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a missions events for plumn, a partially op inockout Tank, the ted produced water ssions from a valve n conducted on July that the final record the Dates Required he dates of complia one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$98 the emissions bened valve emissions from tanks, the on the Bullet 13, 2022 ds for non- is the date the nce. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Notes for DELAYED costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance ONE-TIME avoided costs	Estimated confrom a preconnected to a the valves emissions frank tha (\$250/finate reportable emistions frank tha finate the the the the the the the the the t	sts to create the ssure relief valve a hose that was le and thief hatche om a pressure re t were discovered al record) and to hissions events ar al records were du	final records for on the North We eaking VOC lade s on the Oil Skin lief valve on the l by the TCEQ st implement proce e created in a til ue to be created osts before en	the five ord's Ar n water n water Bullet aff duri edures i nely ma and the 0.00 0.00 0.00 0.00 0.00 0.00	\$0 \$98 non-reportable e nine Contractor Co from the Glycol k ank and its associa Tank, and the emis ng an investigation n order to ensure anner (\$1,500). T e Final Dates are t item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a missions events for plumn, a partially op nockout Tank, the ted produced water ssions from a valve n conducted on July that the final record the Dates Required he dates of complia one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$98 the emissions pened valve emissions from tanks, the on the Bullet 13, 2022 ds for non- is the date the nce. 1 costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Notes for DELAYED costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance	Estimated confrom a pre connected to a the valves emissions fr Tank tha (\$250/fina reportable em fina	sts to create the ssure relief valve a hose that was le and thief hatche om a pressure re t were discovered al record) and to hissions events ar al records were du	final records for on the North We eaking VOC lade s on the Oil Skin lief valve on the l by the TCEQ st implement proce e created in a til ue to be created osts before en	the five ord's Ar n water n water aff duri edures i aff duri and the 0.00 0.00 0.00 0.00 0.00	\$0 \$98 non-reportable e nine Contractor Co from the Glycol k ank and its associa fank, and the emis n order to ensure anner (\$1,500). T e Final Dates are t item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a missions events for plumn, a partially op inockout Tank, the ted produced water ssions from a valve n conducted on July that the final record the Dates Required he dates of complia one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$98 the emissions bened valve emissions from tanks, the on the Bullet 13, 2022 ds for non- is the date the nce. d costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0



Compliance History Report

Compliance History Report for CN604155994, RN100218833, Rating Year 2023 which includes Compliance History (CH) components from September 1, 2018, through August 31, 2023.

Customer, Respondent, or Owner/Operator:	CN604155994, Capital Star Oil and Inc.	Gas, C	assification: HIGH	Rating: 0.00
Regulated Entity:	RN100218833, North Word Gas Plant		lassification: HIGH	Rating: 0.00
Complexity Points:	13		Repeat Violator: NO	
CH Group:	03 - Oil and Gas Extraction			
Location:	867 West Fairwinds Street, Hallettsville, Lavaca County, Texas			
TCEQ Region:	REGION 14 - CORPUS CHRISTI			
ID Number(s):				
AIR OPERATING PERMITS ACCOUNT NUMBER LE0018K		AIR OPERATING PERMITS PERMIT 108		
AIR NEW SOURCE PERMITS ACCOUNT NUMBER		AIR NEW SOURCE PERMITS PERMIT 8874		
LE0018K AIR NEW SOURCE PERMITS EPA PERMIT PSDTX455 AIR NEW SOURCE PERMITS AFS NUM 4828500003				M 4828500002
		AIR NEW SOURCE PERMITS AFS NOM 4828500005 AIR NEW SOURCE PERMITS REGISTRATION 168726		
AIR NEW SOURCE PERMITS REGISTRATION 117749 AIR NEW SOURCE PERMITS REGISTRATION 100720 AIR NEW SOURCE PERMITS REGISTRATION 100720 AIR NEW SOURCE PERMITS REGISTRATION 170961				
AIR NEW SOURCE PERMITS REGISTRATION 107051 AIR NEW SOURCE PERMITS REGISTRATION 170501 AIR EMISSIONS INVENTORY ACCOUNT NUMBER				
AIR NEW SOURCE PERMIT	LE0018K			
Compliance History Peri	iod: September 01, 2018 to August	31, 2023	Rating Year: 2023	Rating Date: 09/01/2023
Date Compliance History Report Prepared: January 29, 2024				
Agency Decision Requiring Compliance History: Enforcement				
Component Period Selected: January 29, 2019 to January 29, 2024				
TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.				
Name: Desmond Marti	in Phone: (512) 239-2814			314

Site and Owner/Operator History:

1) Has the site been in existence and/or operation for the full five year compliance period?YES2) 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 August 07, 2020 (1650883)

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): $_{\mbox{N/A}}$
- H. Voluntary on-site compliance assessment dates: $$\rm N/A$$
- I. Participation in a voluntary pollution reduction program: \$N/A\$
- J. Early compliance:

N/A

Sites Outside of Texas: $_{N/A} \label{eq:N/A}$

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



§

55555

IN THE MATTER OF AN ENFORCEMENT ACTION CONCERNING CAPITAL STAR OIL AND GAS, INC. RN100218833 BEFORE THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2023-1085-AIR-E

I. JURISDICTION AND STIPULATIONS

On ______, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Capital Star Oil and Gas, Inc. (the "Respondent") under the authority of TEX. HEALTH & SAFETY CODE ch. 382 and TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent together stipulate that:

- 1. The Respondent owns and operates a natural gas processing plant located at 867 West Fairwinds Street in Hallettsville, Lavaca County, Texas (the "Plant"). The Plant consists or consisted of one or more sources as defined in TEX. HEALTH & SAFETY CODE § 382.003(12).
- 2. The Executive Director and the Respondent agree that the TCEQ has jurisdiction to enter this Order pursuant to TEX. WATER CODE §§ 7.002, 7.051, and 7.073, and that the Respondent is subject to TCEQ's jurisdiction. The TCEQ has jurisdiction in this matter pursuant to TEX. WATER CODE § 5.013 because it alleges violations of TEX. HEALTH & SAFETY CODE ch. 382 and the rules of the TCEQ.
- 3. The occurrence of any violation is in dispute and the entry of this Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
- 4. An administrative penalty in the amount of \$41,650 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$8,320 of the penalty and \$8,330 is deferred contingent upon the Respondent 's timely and satisfactory compliance with all the terms of this Order and shall be waived only upon full compliance with all the terms and conditions of this Order.

The remaining amount of \$25,000 of the undeferred penalty shall be paid in five monthly payments of \$5,000 each. The first monthly payment shall be paid within 30 days after the effective date of this Order. The subsequent payments shall each be paid not later than 30 days following the due date of the previous payment until the penalty is paid in full. If the Respondent fails to comply with the payment requirements of this Order, including the payment schedule, the Executive Director may accelerate the maturity of the remaining installments, in which event the unpaid balance shall become immediately due and payable without demand or notice. The Respondent 's failure to meet the payment schedule of this Order and/or the acceleration of any remaining balance constitutes the failure by the Respondent to timely and satisfactorily comply with all the terms and conditions of this Order and the Executive Director may demand payment of all or part of the deferred penalty amount.

- 5. The Executive Director and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 TEX. ADMIN. CODE § 70.10(a). Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.
- 6. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Order.
- 7. This Order represents the complete and fully integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable.
- 8. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.
- 9. The Executive Director recognizes that the Respondent implemented the following corrective measures at the Plant:
 - a. On December 12, 2022, submitted the deviation report for the May 3, 2022 through November 2, 2022 reporting period;
 - b. On June 7, 2023, submitted the deviation report for the November 3, 2022 through May 2, 2023 reporting period and the permit compliance certification ("PCC") for the May 3, 2022 through May 2, 2023 certification period;
 - c. By July 19, 2023, submitted the signed certification of accuracy and completeness, Form OP-CRO1, with the PCC for the May 3, 2022 through May 2, 2023 certification period;
 - d. By August 30, 2023, implemented procedures in order to ensure that the deviation reports, PCCs, and signed certifications of accuracy and completeness (Form OP-CRO1) are submitted in a timely manner and implemented procedures in order to ensure that the final records for non-reportable emissions events are created in a timely manner;
 - e. By February 21, 2024, created the final records for the five non-reportable emissions events for the emissions from a pressure relief valve on the North Word's Amine Contractor Column, a partially opened valve connected to a hose that was leaking volatile organic compounds ("VOC") laden water from the Glycol Knockout Tank, the emissions from the valves and thief hatches on the Oil Skimmer Tank and its associated produced water tanks, the emissions from a pressure relief valve on the Bullet Tank, and the emissions from a valve on the Bullet Tank that were discovered by the TCEQ staff during an investigation conducted on July 13, 2022;

- f. By February 27, 2024, submitted the revised deviation report for the May 3, 2022 through November 2, 2022 reporting period to report the deviations for failing to create the final records for five non-reportable emissions events no later than two weeks after the end of the emissions events; and
- g. By February 27, 2024, submitted the revised deviation report for the November 3, 2022 through May 2, 2023 reporting period to report the deviations for failing to submit the deviation report for the May 3, 2022 through November 2, 2022 reporting period no later than 30 days after the end of the reporting period.

II. ALLEGATIONS

During a record review for the Plant conducted from July 24, 2023 through July 25, 2023, an investigator documented that the Respondent:

- 1. Failed to submit a deviation report no later than 30 days after the end of each reporting period, in violation of 30 TEX. ADMIN. CODE §§ 122.143(4) and 122.145(2)(C), Federal Operating Permit ("FOP") No. O108, General Terms and Conditions ("GTC"), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the deviation report for the May 3, 2022 through November 2, 2022 reporting period was due by December 2, 2022, but was not submitted until December 12, 2022. Additionally, the deviation report for the November 3, 2022 through May 2, 2023 reporting period was due by June 1, 2023, but was not submitted until June 7, 2023.
- 2. Failed to submit a PCC within 30 days of any certification period, in violation of 30 Tex. ADMIN. CODE §§ 122.143(4) and 122.146(2), FOP No. O108, GTC and Special Terms and Conditions ("STC") No. 11, and Tex. HEALTH & SAFETY CODE § 382.085(b). Specifically, the PCC for the May 3, 2022 through May 2, 2023 certification period was due by June 1, 2023, but was not submitted until June 7, 2023.
- 3. Failed to submit a signed certification of accuracy and completeness, in violation of 30 TEX. ADMIN. CODE §§ 122.143(4), 122.146(1), and 122.165(a)(8), FOP No. 0108, GTC, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the signed certification of accuracy and completeness, Form OP-CRO1, that was submitted with the PCC for the May 3, 2022 through May 2, 2023 certification period on June 7, 2023 was not signed by the Responsible Official.
- 4. Failed to report all instances of deviations, in violation of 30 TEX. ADMIN. CODE §§ 122.143(4) and 122.145(2)(A), FOP No. O108, GTC, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the deviation report for the May 3, 2022 through November 2, 2022 reporting period did not include the deviations for failing to report five nonreportable emissions events. Additionally, the deviation report for the November 3, 2022 through May 2, 2023 reporting period did not include the deviation for failing to submit the deviation report for the May 3, 2022 through November 2, 2022 reporting period no later than 30 days after the end of the reporting period.
- 5. Failed to create a final record for all reportable and non-reportable emissions events no later than two weeks after the end of an emissions event, in violation of 30 TEX. ADMIN. CODE §§ 101.201(b) and 122.143(4), FOP No. 0108, GTC and STC No. 2.F., and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the final records for five non-reportable emissions events were not created for the emissions from a pressure relief valve on the North Word's Amine Contractor Column, a partially opened valve connected to a hose

that was leaking VOC laden water from the Glycol Knockout Tank, the emissions from the valves and thief hatches on the Oil Skimmer Tank and its associated produced water tanks, the emissions from a pressure relief valve on the Bullet Tank, and the emissions from a valve on the Bullet Tank that were discovered by TCEQ staff during an investigation conducted on July 13, 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: Capital Star Oil and Gas, Inc., Docket No. 2023-1085-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 Plant operations referenced in this Order.
- 4. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.
- 5. This Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
- 6. This Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this

Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms: electronic transmission, owner, person, writing, and written, shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.

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

Capital Star Oil and Gas, Inc. DOCKET NO. 2023-1085-AIR-E Page 6

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date

6/19/2024 Date

For the Executive Director

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.

101 Signature GANT

Date Title

Name (Printed or typed) Authorized Representative of Capital Star Oil and Gas, Inc.

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