

Executive Summary – Enforcement Matter – Case No. 66763
JAMES LAKE MIDSTREAM LLC
RN107088759
Docket No. 2024-1513-AIR-E

Order Type:

1660 Agreed Order

Findings Order Justification:

N/A

Media:

AIR

Small Business:

No

Location(s) Where Violation(s) Occurred:

James Lake Gas Plant, located approximately 0.5 mile northeast of the intersection of 4 Road and Farm-to-Market Road 866, Goldsmith, Ector County

Type of Operation:

Oil and gas production plant

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: September 12, 2025

Comments Received: No

Penalty Information

Total Penalty Assessed: \$13,125

Amount Deferred for Expedited Settlement: \$2,625

Total Paid to General Revenue: \$10,500

Total Due to General Revenue: \$0

Payment Plan: N/A

Compliance History Classifications:

Person/CN - Satisfactory

Site/RN - Satisfactory

Major Source: Yes

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: January 2021

Investigation Information

Complaint Date(s): N/A

Complaint Information: N/A

Date(s) of Investigation: June 10, 2024

Date(s) of NOE(s): August 28, 2024

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RN107088759
Docket No. 2024-1513-AIR-E

Violation Information

Failed to prevent unauthorized emissions. Specifically, the Respondent released 36.30 pounds ("lbs") of carbon monoxide, 120.16 lbs of hydrogen sulfide, 4.30 lbs of nitrogen oxides, 11,057.41 lbs of sulfur dioxide, and 5.30 lbs of volatile organic compounds from the Acid Gas Flare, Emissions Point Number FL-2, during an emissions event (Incident No. 399602) that occurred on April 26, 2023 and lasted one hour and five minutes [30 TEX. ADMIN. CODE §§ 116.615(2) and 122.143(4), Standard Permit Registration No. 116553, Federal Operating Permit No. O4398/General Operating Permit No. 514, Site-wide Requirements Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

By February 5, 2024, the Respondent installed a new scrubber drainage line and replaced the high-pressure diaphragm pump for the acid gas compressor and the centrifugal pump for the electric acid gas compressor in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 399602.

Technical Requirements:

N/A

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Trenton White, Enforcement Division, Enforcement Team 2, MC R-05, (903) 535-5155; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548

Respondent: John Cook, Environmental Director, JAMES LAKE MIDSTREAM LLC, 2331 City West Boulevard, Houston, Texas 77042

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

DATES	Assigned	4-Sep-2024	Screening	5-Sep-2024	EPA Due	
	PCW	27-Jun-2025				

RESPONDENT/FACILITY INFORMATION

Respondent	JAMES LAKE MIDSTREAM LLC		
Reg. Ent. Ref. No.	RN107088759		
Facility/Site Region	7-Midland	Major/Minor Source	Major

CASE INFORMATION

Enf./Case ID No.	66763	No. of Violations	1
Docket No.	2024-1513-AIR-E	Order Type	1660
Media Program(s)	Air	Government/Non-Profit	No
Multi-Media		Enf. Coordinator	Trenton White
		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	100.0%	Adjustment	Subtotals 2, 3, & 7	\$7,500
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Notes: Enhancement for eight NOV with same/similar violations, one NOV with dissimilar violations, one order containing a denial of liability, and two orders without a denial of liability. Reduction for one notice of intent to conduct an audit and one disclosure of violations.

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

Good Faith Effort to Comply Total Adjustments	Subtotal 5	-\$1,875
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Economic Benefit	0.0%	Enhancement*	Subtotal 6	\$0
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Total EB Amounts	\$390
Estimated Cost of Compliance	\$10,000

*Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7	Final Subtotal	\$13,125
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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	\$13,125
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$13,125
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DEFERRAL	20.0%	Reduction	Adjustment	-\$2,625
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Reduces the Final Assessed Penalty by the indicated percentage.

Notes:

Deferral offered for expedited settlement.

PAYABLE PENALTY	\$10,500
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Screening Date	5-Sep-2024	Docket No.	2024-1513-AIR-E	PCW
Respondent	JAMES LAKE MIDSTREAM LLC			<i>Policy Revision 5 (January 28, 2021)</i>
Case ID No.	66763			<i>PCW Revision February 11, 2021</i>
Reg. Ent. Reference No.	RN107088759			
Media	Air			
Enf. Coordinator	Trenton White			

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>)	8	40%
	Other written NOVs	1	2%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	1	20%
	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	2	50%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%
Emissions	Chronic excessive emissions events (<i>number of events</i>)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which notices were submitted</i>)	1	-1%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	1	-2%
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) 109%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

Enhancement for eight NOVs with same/similar violations, one NOV with dissimilar violations, one order containing a denial of liability, and two orders without a denial of liability. Reduction for one notice of intent to conduct an audit and one disclosure of violations.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 109%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% 100%

Screening Date	5-Sep-2024	Docket No.	2024-1513-AIR-E	PCW
Respondent	JAMES LAKE MIDSTREAM LLC			Policy Revision 5 (January 28, 2021)
Case ID No.	66763			PCW Revision February 11, 2021
Reg. Ent. Reference No.	RN107088759			
Media	Air			
Enf. Coordinator	Trenton White			
Violation Number	1			
Rule Cite(s)	30 Tex. Admin. Code §§ 116.615(2) and 122.143(4), Standard Permit Registration No. 116553, Federal Operating Permit No. O4398/General Operating Permit No. 514, Site-wide Requirements Nos. (b)(2) and (b)(9)(E)(ii), and Tex. Health & Safety Code § 382.085(b)			
Violation Description	Failed to prevent unauthorized emissions. Specifically, the Respondent released 36.30 pounds ("lbs") of carbon monoxide, 120.16 lbs of hydrogen sulfide, 4.30 lbs of nitrogen oxides, 11,057.41 lbs of sulfur dioxide, and 5.30 lbs of volatile organic compounds from the Acid Gas Flare, Emissions Point Number FL-2, during an emissions event (Incident No. 399602) that occurred on April 26, 2023 and lasted one hour and five minutes.			
		Base Penalty	\$25,000	
>> Environmental, Property and Human Health Matrix				
OR	Release	Harm		
		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	Number of violation days	1
	daily			
	weekly			
	monthly	x		
	quarterly			
	semiannual			
	annual			
	single event			
	Violation Base Penalty	\$7,500		
	One monthly event is recommended.			
Good Faith Efforts to Comply				
	25.0%		Reduction	\$1,875
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer		
	Extraordinary			
	Ordinary	x		
	N/A			
	Notes	The Respondent completed corrective measures by February 5, 2024, prior to the Notice of Enforcement dated August 28, 2024.		
	Violation Subtotal	\$5,625		
Economic Benefit (EB) for this violation				
	Estimated EB Amount	\$390	Violation Final Penalty Total	\$13,125
	This violation Final Assessed Penalty (adjusted for limits)			\$13,125

Economic Benefit Worksheet

Respondent JAMES LAKE MIDSTREAM LLC
Case ID No. 66763
Reg. Ent. Reference No. RN107088759
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	26-Apr-2023	5-Feb-2024	0.78	\$390	n/a	\$390
Notes for DELAYED costs	Estimated cost to install a new scrubber drainage line and replace the high-pressure diaphragm pump for the acid gas compressor and the centrifugal pump for the electric acid gas compressor in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 399602. The Date Required is the date the emissions event occurred and the Final Date is the date of compliance.						

Avoided Costs

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

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

Approx. Cost of Compliance

\$10,000

TOTAL

\$390



Compliance History Report

Compliance History Report for CN604509893, RN107088759, Rating Year 2024 which includes Compliance History (CH) components from September 1, 2019, through August 31, 2024.

Customer, Respondent, or Owner/Operator: CN604509893, JAMES LAKE MIDSTREAM LLC
Classification: SATISFACTORY
Rating: 21.29

Regulated Entity: RN107088759, JAMES LAKE GAS PLANT
Classification: SATISFACTORY
Rating: 37.27

Complexity Points: 4
Repeat Violator: NO

CH Group: 03 - Oil and Gas Extraction

Location: 2401 Farm-to-Market Road 866, Goldsmith, Ector County, Texas

TCEQ Region: REGION 07 - MIDLAND

ID Number(s):

AIR OPERATING PERMITS PERMIT 4398
AIR NEW SOURCE PERMITS AFS NUM 4813500214
AIR NEW SOURCE PERMITS REGISTRATION 116553
AIR EMISSIONS INVENTORY ACCOUNT NUMBER EBA014N

INDUSTRIAL AND HAZARDOUS WASTE OTS REQUEST 41996
INDUSTRIAL AND HAZARDOUS WASTE EPA ID TXP490355274

Compliance History Period: September 01, 2019 to August 31, 2024
Rating Year: 2024
Rating Date: 09/01/2024

Date Compliance History Report Prepared: June 26, 2025

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: June 26, 2020 to June 26, 2025

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

Name: Caleb Martin
Phone: (512) 239-2091

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? YES
- 3) Who is the current owner/operator? JAMES LAKE MIDSTREAM LLC OWNER OPERATOR since 1/13/2014
- 4) Who was/were the prior owner(s)/operator(s)? DCP Operating Company, LP, OWNER OPERATOR, 8/1/2022 to 8/17/2023

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

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

- 1 Effective Date: 01/19/2022 ADMINORDER 2020-1137-AIR-E (Findings Order-Agreed Order Without Denial)
Classification: Minor
Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
Rqmt Prov: ST&C (42) (F) OP
Description: Failure to notify the TCEQ of three reportable emissions events within 24 hours after exceedance of reportable quantities.
Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter F 116.615(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Condition No. 2 REG
ST&C (b)(9)(E)(ii) OP
Description: Failure to prevent unauthorized emissions. TCEQ STEERS Incident No. 325682.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter F 116.615(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Condition No. 2 REG
ST&C (b)(9)(E)(ii) OP

Description: Failure to prevent unauthorized emissions. TCEQ STEERS Incident No. 326824.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter F 116.615(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: General Condition No. 2 REG
ST&C (b)(9)(E)(ii) OP

Description: Failure to prevent unauthorized emissions. TCEQ STEERS Incident No. 327157.

2 Effective Date: 08/05/2024 ADMINORDER 2023-0906-AIR-E (Findings Order-Agreed Order Without Denial)

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter F 116.615(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: O4398/GOP514, No. (b)(2) OP
O4398/GOP514, No. (b)(9)(E)(ii) OP
Registration No. 116553 PERMIT

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered December 18, 2022, TCEQ STEERS Incident No. 392238. [Category A12.i.(6)]

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
5C THSC Chapter 382 382.085(b)

Description: Failure to submit a notification for a reportable emissions event within 24 hours after the discovery of the event. [Category C3]

3 Effective Date: 08/20/2024 ADMINORDER 2023-1038-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter F 116.615(2)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: 116553 PERMIT
3771/GOP 514, (b)(2) and (b)(9)(E)(ii) OP

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on February 16, 2022, TCEQ/STEERS Incident No. 374444. [Category A12.i.(6)]

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter F 116.615(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: 116553 PERMIT
3771/GOP 514, (b)(2) and (b)(9)(E)(ii) OP
3771-GOP 514, (b)(2) and (b)(9)(E)(ii) OP

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on March 17, 2022, TCEQ/STEERS Incident No. 376242. Category A12.i.(6)

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1	July 14, 2020	(1652007)
Item 2	August 26, 2020	(1659906)
Item 3	August 31, 2020	(1669825)
Item 4	September 25, 2020	(1598928)
Item 5	October 28, 2020	(1685468)
Item 6	November 09, 2020	(1679293)
Item 7	November 18, 2020	(1598613)
Item 8	November 24, 2020	(1691558)
Item 9	November 25, 2020	(1691594)
Item 10	December 07, 2020	(1692874)
Item 11	December 18, 2020	(1679309)
Item 12	December 30, 2020	(1663975)
Item 13	January 11, 2021	(1697926)
Item 14	January 14, 2021	(1698255)
Item 15	January 21, 2021	(1699010)
Item 16	February 19, 2021	(1702266)
Item 17	February 23, 2021	(1702361)
Item 18	February 24, 2021	(1702203)
Item 19	March 10, 2021	(1704460)
Item 20	March 25, 2021	(1706561)
Item 21	April 02, 2021	(1609613)
Item 22	May 24, 2021	(1722690)
Item 23	July 09, 2021	(1738702)
Item 24	July 13, 2021	(1738277)
Item 25	July 16, 2021	(1744973)
Item 26	July 27, 2021	(1745409)
Item 27	August 05, 2021	(1749264)
Item 28	August 06, 2021	(1745129)
Item 29	September 14, 2021	(1756219)
Item 30	March 01, 2022	(1796292)
Item 31	October 03, 2022	(1842151)
Item 32	June 05, 2023	(1867562)
Item 33	July 18, 2023	(1860382)
Item 34	July 25, 2023	(1888006)
Item 35	July 28, 2023	(1867535)
Item 36	August 25, 2023	(1867572)
Item 37	October 02, 2023	(1910570)
Item 38	October 19, 2023	(1888014)
Item 39	October 30, 2023	(1795993)
Item 40	November 07, 2023	(1887737)
Item 41	November 08, 2023	(1795992)
Item 42	December 15, 2023	(1847535)
Item 43	June 21, 2024	(1973611)
Item 44	August 07, 2024	(1888013)
Item 45	September 05, 2024	(1945893)
Item 46	September 18, 2024	(1937919)
Item 47	October 02, 2024	(1950936)
Item 48	March 31, 2025	(1925066)
Item 49	May 12, 2025	(2056241)

E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

1 Date: 07/12/2024 (1887722)

Self Report? NO

Classification: Moderate

Citation: 116553 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter F 116.615(2)
5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on January 5, 2022. TCEQ/STEERS

Incident No. 391511. The units involved were the AJAX and EAGI.

Self Report? NO Classification: Moderate

Citation: 116553 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter F 116.615(2)
5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on March 25, 2023, TCEQ/STEERS Incident No. 397836. The unit involved was the EAGI.

Self Report? NO Classification: Moderate

Citation: 116553 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter F 116.615(2)
5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on March 29, 2023, TCEQ/STEERS Incident No. 398071. The units involved were EAGI and AJAX.

Self Report? NO Classification: Moderate

Citation: 116553 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter F 116.615(2)
5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on March 31, 2023, TCEQ/STEERS Incident No. 398197. The units involved were EAGI and AJAX.

Self Report? NO Classification: Moderate

Citation: 116553 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter F 116.615(2)
5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on April 16, 2023, TCEQ/STEERS Incident No. 399057. The units involved were EAGI and AJAX.

Self Report? NO Classification: Moderate

Citation: 116553 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter F 116.615(2)
5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on November 26, 2023, TCEQ/STEERS Incident No. 413246. The units involved were EAGI and AJAX.

2 Date: 07/30/2024 (2000644)

Self Report? NO Classification: Major

Citation: 116553 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter F 116.615(2)
5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on January 23, 2023, TCEQ/STEERS Incident No. 394268. The units involved were the EAGI and AJAX.

Self Report? NO Classification: Major

Citation: 116553 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter F 116.615(2)
5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on September 19, 2022, TCEQ/STEERS Incident No. 387772. The units involved were EAGI and AJAX.

Self Report? NO Classification: Major

Citation: 116553 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter F 116.615(2)
5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on January 9, 2023, TCEQ/STEERS Incident No. 393459. The units involved were EAGI and AJAX.

Self Report? NO Classification: Major

Citation: 116553 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter F 116.615(2)

5C THSC Chapter 382 382.085(b)
 Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on January 17, 2023. TCEQ/STEERS Incident No. 393916. The units involved were the cryogenics unit and AJAX.
 Self Report? NO Classification: Major
 Citation: 116553 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 116, SubChapter F 116.615(2)
 5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on January 26, 2023. TCEQ/STEERS Incident No. 394539. The unit involved was the AJAX.
 Self Report? NO Classification: Major
 Citation: 116553 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 116, SubChapter F 116.615(2)
 5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on January 29, 2023. TCEQ/STEERS Incident No. 394670. The units involved were the EAGI and AJAX.
 Self Report? NO Classification: Major
 Citation: 116553 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 116, SubChapter F 116.615(2)
 5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on February 7, 2023. TCEQ/STEERS Incident No. 395156. The units involved were the EAGI and AJAX.
 Self Report? NO Classification: Major
 Citation: 116553 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 116, SubChapter F 116.615(2)
 5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on February 10, 2023. TCEQ/STEERS Incident No. 395313. The units involved were EAGI and AJAX.
 Self Report? NO Classification: Major
 Citation: 116553 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 116, SubChapter F 116.615(2)
 5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on February 15, 2023. TCEQ/STEERS Incident No. 395551. The units involved were EAGI and AJAX.
 Self Report? NO Classification: Major
 Citation: 116553 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 116, SubChapter F 116.615(2)
 5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on February 20, 2023. TCEQ/STEERS Incident No. 395719. The unit involved was the AJAX.
 Self Report? NO Classification: Major
 Citation: 116553 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 116, SubChapter F 116.615(2)
 5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on April 6, 2023. TCEQ/STEERS Incident No. 398472. The units involved were the EAGI and AJAX.
 Self Report? NO Classification: Major
 Citation: 116553 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 116, SubChapter F 116.615(2)
 5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on August 1, 2023. TCEQ/STEERS Incident No. 407169.

Citation: 116553 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 116, SubChapter F 116.615(2)
 5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on October 5, 2023, TCEQ/STEERS Incident No. 410813.

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Date: 09/23/2024 (1909587)

Self Report? NO Classification: Major

Citation: 116553 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 116, SubChapter F 116.615(2)
 5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on September 19, 2022, TCEQ/STEERS Incident No. 387770. The unit involved in this incident was the AJAX.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)
 5C THSC Chapter 382 382.085(b)

Description: Failure to notify the TCEQ of a reportable emissions event within 24 hours after the discovery of the event.

Self Report? NO Classification: Major

Citation: 116553 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 116, SubChapter F 116.615(2)
 5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on December 31, 2022, at 5:54 PM, TCEQ/STEERS Incident No. 393184. The units involved in this event were the AJAX and EAGI.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)
 5C THSC Chapter 382 382.085(b)

Description: Failure to notify the TCEQ of a reportable emissions event within 24 hours after the discovery of the event.

Self Report? NO Classification: Major

Citation: 116553 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 116, SubChapter F 116.615(2)
 5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on April 19, 2023, at 10:50 AM, TCEQ/STEERS Incident No. 399282. The units involved in this event were the AJAX and EAGI.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)
 5C THSC Chapter 382 382.085(b)

Description: Failure to notify the TCEQ of a reportable emissions event within 24 hours after the discovery of the event.

Self Report? NO Classification: Major

Citation: 116553 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 116, SubChapter F 116.615(2)
 5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on January 3, 2023, at 12:53 PM, TCEQ/STEERS Incident No. 393178. The unit involved in this incident was the regen gas heater.

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Date: 02/11/2025 (1867479)

Self Report? NO Classification: Moderate

Citation: 116553 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 116, SubChapter F 116.615(2)
 5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on January 22, 2024, TCEQ/STEERS Incident No. 416096.

Self Report? NO Classification: Moderate

Citation: 116553 PERMIT

30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 116, SubChapter F 116.615(2)
 5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on January 25, 2024, TCEQ/STEERS Incident No. 416301.

Self Report? NO Classification: Moderate

Citation: 116553 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 116, SubChapter F 116.615(2)
 5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on January 27, 2024, TCEQ/STEERS Incident No. 416372.

Self Report? NO Classification: Moderate

Citation: 116553 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 116, SubChapter F 116.615(2)
 5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on January 28, 2024, TCEQ/STEERS Incident No. 416380.

Self Report? NO Classification: Moderate

Citation: 116553 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 116, SubChapter F 116.615(2)
 5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on April 26, 2024, TCEQ/STEERS Incident No. 422055.

Self Report? NO Classification: Moderate

Citation: 116553 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 116, SubChapter F 116.615(2)
 5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on June 14, 2024, TCEQ/STEERS Incident No. 424965.

Self Report? NO Classification: Moderate

Citation: 116553 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 116, SubChapter F 116.615(2)
 5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on September 5, 2024, TCEQ/STEERS Incident No. 429296.

Self Report? NO Classification: Moderate

Citation: 116553 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 116, SubChapter F 116.615(2)
 5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on September 6, 2024, TCEQ/STEERS Incident No. 429361.

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Date: 03/10/2025 (1989847)

Self Report? NO Classification: Moderate

Citation: 116553 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 116, SubChapter F 116.615(2)
 5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on April 25, 2024, TCEQ/STEERS Incident No. 422032.

Self Report? NO Classification: Moderate

Citation: 116553 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 116, SubChapter F 116.615(2)
 5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on June 28, 2024, TCEQ/STEERS

	Incident No. 425754.		
Self Report?	NO	Classification:	Moderate
Citation:	116553 PERMIT 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter F 116.615(2) 5C THSC Chapter 382 382.085(b)		
Description:	Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on August 22, 2024, TCEQ/STEERS Incident No. 428487.		
Self Report?	NO	Classification:	Moderate
Citation:	116553 PERMIT 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter F 116.615(2) 5C THSC Chapter 382 382.085(b)		
Description:	Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on September 13, 2024, TCEQ/STEERS Incident No. 429734.		
Self Report?	NO	Classification:	Moderate
Citation:	116553 PERMIT 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter F 116.615(2) 5C THSC Chapter 382 382.085(b)		
Description:	Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on September 24, 2024, TCEQ/STEERS Incident No. 430175.		
Self Report?	NO	Classification:	Moderate
Citation:	116553 PERMIT 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter F 116.615(2) 5C THSC Chapter 382 382.085(b)		
Description:	Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on October 2, 2024, TCEQ/STEERS Incident No. 430624.		
Self Report?	NO	Classification:	Moderate
Citation:	116553 PERMIT 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter F 116.615(2) 5C THSC Chapter 382 382.085(b)		
Description:	Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on October 9, 2024, TCEQ/STEERS Incident No. 430929.		
Self Report?	NO	Classification:	Moderate
Citation:	116553 PERMIT 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter F 116.615(2) 5C THSC Chapter 382 382.085(b)		
Description:	Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on November 3, 2024, TCEQ/STEERS Incident No. 431873.		
Self Report?	NO	Classification:	Moderate
Citation:	116553 PERMIT 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter F 116.615(2) 5C THSC Chapter 382 382.085(b)		
Description:	Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on November 5, 2024, TCEQ/STEERS Incident No. 431941.		
Self Report?	NO	Classification:	Moderate
Citation:	116553 PERMIT 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 116, SubChapter F 116.615(2) 5C THSC Chapter 382 382.085(b)		
Description:	Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on December 18, 2024, TCEQ/STEERS Incident No. 433631.		
7	Date: 03/14/2025 (1860403)		
Self Report?	NO	Classification:	Moderate
Citation:	30 TAC Chapter 101, SubChapter F 101.201(a)(1) 5C THSC Chapter 382 382.085(b)		
Description:	Failure to notify the TCEQ of a reportable emissions event within 24 hours		

after the discovery of the event.

Self Report? NO Classification: Moderate

Citation: 116553 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter F 116.615(2)
5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on October 30, 2023, TCEQ/STEERS Incident No. 411909.

Self Report? NO Classification: Moderate

Citation: 116553 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter F 116.615(2)
5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on November 1, 2023, TCEQ/STEERS Incident No. 412205.

Self Report? NO Classification: Moderate

Citation: 116553 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter F 116.615(2)
5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on March 19, 2024, TCEQ/STEERS Incident No. 419068.

Self Report? NO Classification: Moderate

Citation: 116553 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter F 116.615(2)
5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on April 16, 2024, TCEQ/STEERS Incident No. 421492.

Self Report? NO Classification: Moderate

Citation: 116553 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter F 116.615(2)
5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on April 17, 2024, TCEQ/STEERS Incident No. 421568.

Self Report? NO Classification: Moderate

Citation: 116553 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter F 116.615(2)
5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on April 25, 2024, TCEQ/STEERS Incident No. 432095.

Self Report? NO Classification: Moderate

Citation: 116553 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter F 116.615(2)
5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on August 11, 2024, TCEQ/STEERS Incident No. 427840.

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Date: 04/04/2025 (1983012)

Self Report? NO Classification: Moderate

Citation: 116553 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter F 116.615(2)
5C THSC Chapter 382 382.085(b)

Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on March 20, 2024, at 6:20 PM, TCEQ/STEERS Incident No. 419132.

Self Report? NO Classification: Moderate

Citation: 116553 PERMIT
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter F 116.615(2)

5C THSC Chapter 382 382.085(b)
 Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on July 7, 2024, at 3:50 PM, TCEQ/STEERS Incident No. 426007.
 Self Report? NO Classification: Moderate
 Citation: 116553 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 116, SubChapter F 116.615(2)
 5C THSC Chapter 382 382.085(b)
 Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on March 21, 2024, at 12:30 AM, TCEQ/STEERS Incident No. 419133.
 Self Report? NO Classification: Moderate
 Citation: 116553 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 116, SubChapter F 116.615(2)
 5C THSC Chapter 382 382.085(b)
 Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on April 22, 2024, at 3:02 PM, TCEQ/STEERS Incident No. 421718.
 Self Report? NO Classification: Moderate
 Citation: 116553 PERMIT
 30 TAC Chapter 116, SubChapter B 116.115(c)
 30 TAC Chapter 116, SubChapter F 116.615(2)
 5C THSC Chapter 382 382.085(b)
 Description: Failure to prevent unauthorized emissions to the atmosphere during an emissions event that was discovered on May 22, 2024, at 5:42 PM, TCEQ/STEERS Incident No. 423694.

9 Date: 05/06/2025 (2063736)
 Self Report? NO Classification: Minor
 Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
 30 TAC Chapter 101, SubChapter F 101.221(a)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(2)
 Description: Failure to maintain and operate all pollution emission capture equipment and abatement equipment in good working order in accordance with the 30 Texas Administrative Codes (TAC) §30TAC 101.20(1), §30TAC 101.221(a), and 40 CFR60.18(c)(2).

F. Environmental audits:

Notice of Intent Date: 08/01/2022 (1840000)
 Disclosure Date: 02/08/2023
 Viol. Moderate
 Classification:
 Citation: 30 TAC Chapter 116, SubChapter F 116.611(c)
 30 TAC Chapter 116, SubChapter F 116.615(2)
 Description: Failure to update representations in the certified registration for the site.
 Viol. Moderate
 Classification:
 Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)
 30 TAC Chapter 101, SubChapter F 101.201(b)
 Description: Failure to quantify and document reportable/recordable emissions events following potential release of unauthorized emissions.
 Viol. Moderate
 Classification:
 Citation: 30 TAC Chapter 116, SubChapter F 116.611
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT OOOOa 60.5420a(b)(1)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT OOOOa 60.5420a(b)(7)
 Description: Failure to submit an annual report for fugitive monitoring surveys for years 2020 to present.
 Viol. Moderate
 Classification:
 Citation: 30 TAC Chapter 116, SubChapter F 116.611
 Description: Failure to ensure the dehydration units regeneration vents are vented to the appropriate control device.
 Viol. Moderate
 Classification:
 Citation: 30 TAC Chapter 116, SubChapter F 116.611
 Description: Failure to ensure Heater H-520 meets the Table 10 process heater BACT for CO.

Viol. Moderate
 Classification:
 Citation: 30 TAC Chapter 116, SubChapter F 116.611
 Description: Failure to ensure Heater H-425HOt Oil Heater complies with permit representations for BACT CO.
 Viol. Moderate
 Classification:
 Citation: 30 TAC Chapter 116, SubChapter F 116.611
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT 0000a 60.5420a(b)(1)
 40 CFR Chapter 60, SubChapter C, PT 60, SubPT 0000a 60.5420a(b)(7)
 Description: Failure to submit an annual report for fugitive monitoring surveys for years 2020 to present.
 Viol. Moderate
 Classification:
 Citation: 30 TAC Chapter 116, SubChapter F 116.611
 Description: Failure to maintain records of loss of flare pilot flames.
 Viol. Moderate
 Classification:
 Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
 Description: Failure to maintain records for planned MSS activities.
 Viol. Moderate
 Classification:
 Citation: 30 TAC Chapter 116, SubChapter F 116.611
 Description: Failure to maintain fuel flow records for engines and heaters authorized for less than 8,760 hrs/yr.
 Viol. Moderate
 Classification:
 Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(ii)
 Description: Failure to maintain a log of daily flare observations and if the flare was smoking.

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
JAMES LAKE MIDSTREAM LLC
RN107088759

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

AGREED ORDER DOCKET NO. 2024-1513-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 JAMES LAKE MIDSTREAM LLC (the "Respondent") under the authority of TEX. HEALTH & SAFETY CODE ch. 382 and TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent together stipulate that:

1. The Respondent owns and operates an oil and gas production plant located at 2401 Farm-to-Market Road 866 in Goldsmith, Ector 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 \$13,125 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$10,500 of the penalty and \$2,625 is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Order. The deferred amount shall be waived only upon full compliance with all the terms and conditions contained in this Order. If the Respondent fails to timely and satisfactorily comply with any of the terms or requirements contained in this Order, the Executive Director may demand payment of all or part of the deferred penalty amount.
5. The Executive Director and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 TEX. ADMIN. CODE § 70.10(a). Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.

6. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Order.
7. This Order represents the complete and fully integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable.
8. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.
9. The Executive Director recognizes that by February 5, 2024, the Respondent installed a new scrubber drainage line and replaced the high-pressure diaphragm pump for the acid gas compressor and the centrifugal pump for the electric acid gas compressor in order to prevent the recurrence of emissions events due to the same or similar causes as Incident No. 399602.

II. ALLEGATIONS

During a record review for the Plant conducted on June 10, 2024, an investigator documented that the Respondent failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.615(2) and 122.143(4), Standard Permit Registration No. 116553, Federal Operating Permit No. O4398/General Operating Permit No. 514, Site-wide Requirements Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent released 36.30 pounds ("lbs") of carbon monoxide, 120.16 lbs of hydrogen sulfide, 4.30 lbs of nitrogen oxides, 11,057.41 lbs of sulfur dioxide, and 5.30 lbs of volatile organic compounds from the Acid Gas Flare, Emissions Point Number FL-2, during an emissions event (Incident No. 399602) that occurred on April 26, 2023 and lasted one hour and five minutes.

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: JAMES LAKE MIDSTREAM LLC, Docket No. 2024-1513-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.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date

Krista Mello-Jurack

For the Executive Director

11/10/2025

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.

John Cook

Signature

8-4-25

Date

John Cook

Name (Printed or typed)
Authorized Representative of
JAMES LAKE MIDSTREAM LLC

Environmental Director

Title

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