

**Executive Summary – Enforcement Matter – Case No. 66863**  
**SCHLUMBERGER TECHNOLOGY CORPORATION**  
**RN102805884**  
**Docket No. 2024-1668-PWS-E**

**Order Type:**

Findings Agreed Order

**Findings Order Justification:**

Three repeated enforcement actions (or two orders with nuisance violations) over the prior five year period for the same violation(s).

**Media:**

PWS

**Small Business:**

No

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

Schlumberger Rosharaon Campus, 14910 Airline Road, Rosharon, Brazoria County

**Type of Operation:**

Public water supply

**Other Significant Matters:**

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

**Texas Register Publication Date:** May 30, 2025

**Comments Received:** No

***Penalty Information***

**Total Penalty Assessed:** \$1,587

**Total Paid to General Revenue:** \$1,587

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

Payment Plan: N/A

**Compliance History Classifications:**

Person/CN - Satisfactory

Site/RN - Satisfactory

**Major Source:** No

**Statutory Limit Adjustment:** N/A

**Applicable Penalty Policy:** January 2021

***Investigation Information***

**Complaint Date(s):** N/A

**Complaint Information:** N/A

**Date(s) of Investigation:** September 23, 2024 through October 4, 2024

**Date(s) of NOE(s):** October 4, 2024

***Violation Information***

Failed to comply with the maximum contaminant level of 0.080 milligrams per liter for total trihalomethanes based on the locational running annual average [30 TEX. ADMIN. CODE § 290.115(f)(1) and TEX. HEALTH & SAFETY CODE § 341.0315(c)].

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***Corrective Actions/Technical Requirements***

**Corrective Action(s) Completed:**

By March 21, 2025, the Respondent returned to compliance with the maximum contaminant level for total trihalomethanes based on the locational running annual average at the Facility.

**Technical Requirements:**

N/A

***Contact Information***

**TCEQ Attorney:** N/A

**TCEQ Enforcement Coordinator:** Hilda Iyasele, Enforcement Division, Enforcement Team 4, MC R-12, (512) 239-5280; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548

**Respondent:** Bahar Erdogan Romman, President, SCHLUMBERGER TECHNOLOGY CORPORATION, 14910 Airline Road, Rosharon, Texas 77583-7900

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



# Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

<b>DATES</b>	<b>Assigned</b>	7-Oct-2024	<b>Screening</b>	8-Oct-2024	<b>EPA Due</b>	31-Dec-2024
	<b>PCW</b>	18-Oct-2024				

## RESPONDENT/FACILITY INFORMATION

<b>Respondent</b>	SCHLUMBERGER TECHNOLOGY CORPORATION
<b>Reg. Ent. Ref. No.</b>	RN102805884
<b>Facility/Site Region</b>	12-Houston
<b>Major/Minor Source</b>	Minor

## CASE INFORMATION

<b>Enf./Case ID No.</b>	66863	<b>No. of Violations</b>	1
<b>Docket No.</b>	2024-1668-PWS-E	<b>Order Type</b>	Findings
<b>Media Program(s)</b>	Public Water Supply	<b>Government/Non-Profit</b>	No
<b>Multi-Media</b>		<b>Enf. Coordinator</b>	Hilda Iyasele
		<b>EC's Team</b>	Enforcement Team 4
<b>Admin. Penalty \$ Limit Minimum</b>	\$50	<b>Maximum</b>	\$5,000

## Penalty Calculation Section

<b>TOTAL BASE PENALTY (Sum of violation base penalties)</b>	<b>Subtotal 1</b>	\$1,250
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## ADJUSTMENTS (+/-) TO SUBTOTAL 1

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

<b>Compliance History</b>	37.0%	<b>Adjustment</b>	<b>Subtotals 2, 3, &amp; 7</b>	\$462
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<b>Notes</b>	Enhancement for three NOV's with the same/similar violations, one NOV with dissimilar violations, and one agreed order containing a denial of liability.
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<b>Culpability</b>	No	0.0%	<b>Enhancement</b>	<b>Subtotal 4</b>	\$0
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<b>Notes</b>	The Respondent does not meet the culpability criteria.
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<b>Good Faith Effort to Comply Total Adjustments</b>	<b>Subtotal 5</b>	-\$125
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<b>Economic Benefit</b>	0.0%	<b>Enhancement*</b>	<b>Subtotal 6</b>	\$0
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Total EB Amounts	\$340	*Capped at the Total EB \$ Amount
Estimated Cost of Compliance	\$5,000	

<b>SUM OF SUBTOTALS 1-7</b>	<b>Final Subtotal</b>	\$1,587
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<b>OTHER FACTORS AS JUSTICE MAY REQUIRE</b>	0.0%	<b>Adjustment</b>	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage.

<b>Notes</b>	
<b>Final Penalty Amount</b>	\$1,587

<b>STATUTORY LIMIT ADJUSTMENT</b>	<b>Final Assessed Penalty</b>	\$1,587
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<b>DEFERRAL</b>	0.0%	<b>Reduction</b>	<b>Adjustment</b>	\$0
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Reduces the Final Assessed Penalty by the indicated percentage.

<b>Notes</b>	No deferral is recommended for Findings Orders.
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<b>PAYABLE PENALTY</b>	\$1,587
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<b>Screening Date</b>	8-Oct-2024	<b>Docket No.</b>	2024-1668-PWS-E	<b>PCW</b>
<b>Respondent</b>	SCHLUMBERGER TECHNOLOGY CORPORATION			<i>Policy Revision 5 (January 28, 2021)</i>
<b>Case ID No.</b>	66863			<i>PCW Revision February 11, 2021</i>
<b>Reg. Ent. Reference No.</b>	RN102805884			
<b>Media</b>	Public Water Supply			
<b>Enf. Coordinator</b>	Hilda Iyasele			

### 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> )	3	15%
	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	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government ( <i>number of judgments or consent decrees meeting criteria</i> )	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government ( <i>number of counts</i> )	0	0%
Emissions	Chronic excessive emissions events ( <i>number of events</i> )	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 ( <i>number of audits for which notices were submitted</i> )	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 ( <i>number of audits for which violations were disclosed</i> )	0	0%
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

**Adjustment Percentage (Subtotal 2)** 37%

#### >> 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

<b>Compliance History Notes</b>	Enhancement for three NOVs with the same/similar violations, one NOV with dissimilar violations, and one agreed order containing a denial of liability.
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**Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7)** 37%

#### >> Final Compliance History Adjustment

**Final Adjustment Percentage \*capped at 100%** 37%

<b>Screening Date</b>	8-Oct-2024	<b>Docket No.</b>	2024-1668-PWS-E	<b>PCW</b>
<b>Respondent</b>	SCHLUMBERGER TECHNOLOGY CORPORATION			Policy Revision 5 (January 28, 2021)
<b>Case ID No.</b>	66863			PCW Revision February 11, 2021
<b>Reg. Ent. Reference No.</b>	RN102805884			
<b>Media</b>	Public Water Supply			
<b>Enf. Coordinator</b>	Hilda Iyasele			
<b>Violation Number</b>	1			
<b>Rule Cite(s)</b>	30 Tex. Admin. Code § 290.115(f)(1) and Tex. Health & Safety Code § 341.0315(c)			
<b>Violation Description</b>	Failed to comply with the maximum contaminant level ("MCL") of 0.080 milligrams per liter ("mg/L") for total trihalomethanes ("TTHM"), based on the locational running annual average. Specifically, the locational running annual average concentrations of TTHM for Stage 2 Disinfection Byproducts at Site 1 were 0.087 mg/L for the first quarter of 2024, 0.085 mg/L for the second quarter of 2024, and 0.086 mg/L for the third quarter of 2024.			
		<b>Base Penalty</b>	\$5,000	
>> Environmental, Property and Human Health Matrix				
OR	<b>Release</b>	<b>Harm</b>		
		Major	Moderate	Minor
	Actual		x	
	Potential			
				<b>Percent</b> 25.0%
>>Programmatic Matrix				
	<b>Falsification</b>	Major	Moderate	Minor
				<b>Percent</b> 0.0%
<b>Matrix Notes</b>	Exceeding the MCL for TTHM caused persons served by the Facility to be exposed to a significant amount of contaminants which did not exceed levels protective of human health.			
		<b>Adjustment</b>	\$3,750	
			\$1,250	
Violation Events				
	<b>Number of Violation Events</b>	1	273	<b>Number of violation days</b>
	<b>Frequency</b>			
	daily			
	weekly			
	monthly			
	quarterly			
	semiannual			
	annual	x		
	single event			
		<b>Violation Base Penalty</b> \$1,250		
	One annual event is recommended.			
Good Faith Efforts to Comply				
		10.0%	<b>Reduction</b>	\$125
		Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	
	Extraordinary			
	Ordinary		x	
	N/A			
	<b>Notes</b>	The Respondent achieved compliance on March 21, 2025.		
		<b>Violation Subtotal</b>	\$1,125	
Economic Benefit (EB) for this violation				
	<b>Statutory Limit Test</b>			
	<b>Estimated EB Amount</b>	\$340	<b>Violation Final Penalty Total</b>	\$1,588
	<b>This violation Final Assessed Penalty (adjusted for limits)</b>			\$1,588

# Economic Benefit Worksheet

**Respondent** SCHLUMBERGER TECHNOLOGY CORPORATION  
**Case ID No.** 66863  
**Reg. Ent. Reference No.** RN102805884  
**Media** Public Water Supply  
**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)	\$5,000	31-Mar-2024	21-Mar-2025	0.97	\$16	\$324	\$340
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

The other (as needed) cost includes the estimated cost to investigate, identify, and implement the necessary corrective actions to return to compliance with the MCL for TTHM, calculated from the last day of the first quarter of noncompliance to the date of compliance.

## Avoided Costs

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

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

Notes for AVOIDED costs

Approx. Cost of Compliance

\$5,000

**TOTAL**

\$340



# Compliance History Report

Compliance History Report for CN600384481, RN102805884, Rating Year 2024 which includes Compliance History (CH) components from September 1, 2019, through August 31, 2024.

<b>Customer, Respondent, or Owner/Operator:</b>	CN600384481, SCHLUMBERGER TECHNOLOGY CORPORATION	<b>Classification:</b>	SATISFACTORY	<b>Rating:</b>	0.54
<b>Regulated Entity:</b>	RN102805884, SCHLUMBERGER ROSHARON CAMPUS	<b>Classification:</b>	SATISFACTORY	<b>Rating:</b>	2.22
<b>Complexity Points:</b>	12	<b>Repeat Violator:</b>	NO		
<b>CH Group:</b>	14 - Other				
<b>Location:</b>	14910 AIRLINE ROAD IN ROSHARON, BRAZORIA COUNTY, TEXAS				
<b>TCEQ Region:</b>	REGION 12 - HOUSTON				
<b>ID Number(s):</b>					
<b>PUBLIC WATER SYSTEM/SUPPLY</b> REGISTRATION 0200426		<b>AIR NEW SOURCE PERMITS</b> ACCOUNT NUMBER BL0081T			
<b>AIR NEW SOURCE PERMITS</b> REGISTRATION 141502		<b>AIR NEW SOURCE PERMITS</b> REGISTRATION 162045			
<b>AIR NEW SOURCE PERMITS</b> REGISTRATION 148322		<b>STORMWATER</b> PERMIT TXR05K048			
<b>WASTEWATER</b> EPA ID TX0078646		<b>WASTEWATER</b> PERMIT WQ0004679000			
<b>POLLUTION PREVENTION PLANNING</b> ID NUMBER P02095		<b>INDUSTRIAL AND HAZARDOUS WASTE</b> EPA ID TXD000750349			
<b>INDUSTRIAL AND HAZARDOUS WASTE</b> SOLID WASTE REGISTRATION # (SWR) 33224					
<b>Compliance History Period:</b>	September 01, 2019 to August 31, 2024	<b>Rating Year:</b>	2024	<b>Rating Date:</b>	09/01/2024
<b>Date Compliance History Report Prepared:</b>	March 21, 2025				
<b>Agency Decision Requiring Compliance History:</b>	Enforcement				
<b>Component Period Selected:</b>	March 21, 2020 to March 21, 2025				
<b>TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.</b>					
<b>Name:</b>	Hilda Iyasele		<b>Phone:</b>	(512) 239-5280	

## Site and Owner/Operator History:

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

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

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

- |   |   |  |
|---|---|--|
| 1 | Effective Date: 03/01/2022  | ADMINORDER 2021-0506-IWD-E (1660 Order-Agreed Order With Denial) |
|   | Classification: Moderate  |  |
|   | Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)(1)  |  |
|   | 30 TAC Chapter 305, SubChapter F 305.125(1)   |  |
|   | Rqmt Prov: Effluent Limits PERMIT   |  |
|   | Description: Failure to comply with permit effluent limits as documented by a TCEQ record review of self-reported data. |  |

### **B. Criminal convictions:**

N/A

### **C. Chronic excessive emissions events:**

N/A

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

- |        |                    |           |
|--------|--------------------|-----------|
| Item 1 | June 17, 2020      | (1667652) |
| Item 2 | September 16, 2020 | (1687948) |

Item 3	October 15, 2020	(1694296)
Item 4	December 18, 2020	(1715520)
Item 5	February 19, 2021	(1728591)
Item 6	July 13, 2021	(1752722)
Item 7	July 27, 2021	(1738808)
Item 8	August 19, 2021	(1758135)
Item 9	September 20, 2021	(1767390)
Item 10	October 19, 2021	(1777849)
Item 11	November 20, 2021	(1784644)
Item 12	December 17, 2021	(1791678)
Item 13	January 17, 2022	(1799520)
Item 14	February 09, 2022	(1807352)
Item 15	March 18, 2022	(1814403)
Item 16	April 20, 2022	(1820974)
Item 17	May 16, 2022	(1829807)
Item 18	June 14, 2022	(1836107)
Item 19	July 21, 2022	(1843306)
Item 20	August 15, 2022	(1849473)
Item 21	October 18, 2022	(1863595)
Item 22	November 16, 2022	(1870505)
Item 23	December 02, 2022	(1824226)
Item 24	December 16, 2022	(1876359)
Item 25	January 19, 2023	(1883173)
Item 26	February 17, 2023	(1890984)
Item 27	March 20, 2023	(1899556)
Item 28	April 18, 2023	(1906359)
Item 29	May 18, 2023	(1913514)
Item 30	June 19, 2023	(1920122)
Item 31	July 20, 2023	(1927089)
Item 32	August 15, 2023	(1934053)
Item 33	September 07, 2023	(1940192)
Item 34	October 19, 2023	(1947030)
Item 35	November 20, 2023	(1952718)
Item 36	December 20, 2023	(1962492)
Item 37	January 19, 2024	(1969080)
Item 38	March 19, 2024	(1984718)
Item 39	April 19, 2024	(1991241)
Item 40	May 20, 2024	(1997696)
Item 41	June 19, 2024	(2004659)
Item 42	July 19, 2024	(2012205)
Item 43	August 19, 2024	(2017797)
Item 44	September 18, 2024	(2024834)
Item 45	October 18, 2024	(2030948)
Item 46	December 19, 2024	(2043650)
Item 47	January 20, 2025	(2050215)

#### **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:      04/05/2024      (2015854)  
          Self Report?      NO      Classification:      Moderate  
          Citation:      30 TAC Chapter 290, SubChapter F 290.115(f)(1)  
          Description:      TTHM LRAA MCL 1Q2024 – During the 1st quarter of 2024 the system violated  
          the maximum contaminant level for trihalomethanes with a LRAA of 0.087  
          mg/L at API Site, 14910 Airline Road (DBP2-01). ETT Point Value = 5

2      Date:      06/19/2024      (2015854)  
          Self Report?      NO      Classification:      Moderate  
          Citation:      30 TAC Chapter 290, SubChapter F 290.115(f)(1)  
          Description:      TTHM LRAA MCL 2Q2024 – During the 2nd quarter of 2024 the system



violated the maximum contaminant level for trihalomethanes with a LRAA of 0.085 mg/L at API Site, 14910 Airline Road (DBP2-01). ETT Point Value = 5

- 3      Date:      09/17/2024      (2015854)  
Self Report?      NO      Classification:      Moderate  
Citation:      30 TAC Chapter 290, SubChapter F 290.115(f)(1)  
Description:      TTHM LRAA MCL 3Q2024 – During the 3rd quarter of 2024 the system violated the maximum contaminant level for trihalomethanes with a LRAA of 0.086 mg/L at API Site, 14910 Airline Road (DBP2-01). ETT Point Value = 5
- 4      Date:      10/31/2024      (2037264)  
Self Report?      YES      Classification:      Moderate  
Citation:      2D TWC Chapter 26, SubChapter A 26.121(a)  
                    30 TAC Chapter 305, SubChapter F 305.125(1)  
Description:      Failure to meet the limit for one or more permit parameter

**F. Environmental audits:**

N/A

**G. Type of environmental management systems (EMSs):**

N/A

**H. Voluntary on-site compliance assessment dates:**

N/A

**I. Participation in a voluntary pollution reduction program:**

N/A

**J. Early compliance:**

N/A

**Sites Outside of Texas:**

N/A

## **Component Appendices**

### **Appendix A**

#### **All NOV's Issued During Component Period 3/21/2020 and 3/21/2025**

1	Date: 03/31/2020 (1654552) Self Report? YES Citation: 2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1) Description: Failure to meet the limit for one or more permit parameter	Classification: Moderate
2	Date: 04/30/2020 (1661122) Self Report? YES Citation: 2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1) Description: Failure to meet the limit for one or more permit parameter	Classification: Moderate
3	Date: 06/30/2020 (1674600) Self Report? YES Citation: 2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1) Description: Failure to meet the limit for one or more permit parameter	Classification: Moderate
4	Date: 07/31/2020 (1681372) Self Report? YES Citation: 2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1) Description: Failure to meet the limit for one or more permit parameter	Classification: Moderate
5	Date: 10/31/2020 (1715519) Self Report? YES Citation: 2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1) Description: Failure to meet the limit for one or more permit parameter	Classification: Moderate
6	Date: 12/31/2020 (1715521) Self Report? YES Citation: 2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1) Description: Failure to meet the limit for one or more permit parameter	Classification: Moderate
7	Date: 02/28/2021 (1728592) Self Report? YES Citation: 2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1) Description: Failure to meet the limit for one or more permit parameter	Classification: Moderate
8	Date: 03/31/2021 (1728593) Self Report? YES	Classification: Moderate

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)  
30 TAC Chapter 305, SubChapter F 305.125(1)  
Description: Failure to meet the limit for one or more permit parameter

- 9 Date: 04/30/2021 (1741590)  
Self Report? YES Classification: Moderate  
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)  
30 TAC Chapter 305, SubChapter F 305.125(1)  
Description: Failure to meet the limit for one or more permit parameter
- 10 Date: 05/31/2021 (1748114)  
Self Report? YES Classification: Moderate  
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)  
30 TAC Chapter 305, SubChapter F 305.125(1)  
Description: Failure to meet the limit for one or more permit parameter
- 11 Date: 08/31/2022 (1857239)  
Self Report? YES Classification: Moderate  
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)  
30 TAC Chapter 305, SubChapter F 305.125(1)  
Description: Failure to meet the limit for one or more permit parameter
- 12\* Date: 01/31/2024 (1978145)  
Self Report? YES Classification: Moderate  
Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)  
30 TAC Chapter 305, SubChapter F 305.125(1)  
Description: Failure to meet the limit for one or more permit parameter
- 13\* Date: 04/05/2024 (2015854)  
Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 290, SubChapter F 290.115(f)(1)  
Description: TTHM LRAA MCL 1Q2024 – During the 1st quarter of 2024 the system violated the maximum contaminant level for trihalomethanes with a LRAA of 0.087 mg/L at API Site, 14910 Airline Road (DBP2-01). ETT Point Value = 5
- 14\* Date: 06/19/2024 (2015854)  
Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 290, SubChapter F 290.115(f)(1)  
Description: TTHM LRAA MCL 2Q2024 – During the 2nd quarter of 2024 the system violated the maximum contaminant level for trihalomethanes with a LRAA of 0.085 mg/L at API Site, 14910 Airline Road (DBP2-01). ETT Point Value = 5
- 15 Date: 09/17/2024 (2015854)  
Self Report? NO Classification: Moderate  
Citation: 30 TAC Chapter 290, SubChapter F 290.115(f)(1)  
Description: TTHM LRAA MCL 3Q2024 – During the 3rd quarter of 2024 the system violated the maximum contaminant level for trihalomethanes with a LRAA of 0.086 mg/L at API Site, 14910 Airline Road (DBP2-01). ETT Point Value = 5
- 16 Date: 10/31/2024 (2037264)  
Self Report? YES Classification: Moderate

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)  
 30 TAC Chapter 305, SubChapter F 305.125(1)  
 Description: Failure to meet the limit for one or more permit parameter

\* NOVs applicable for the Compliance History rating period 9/1/2019 to 8/31/2024

## Appendix B

### All Investigations Conducted During Component Period March 21, 2020 and March 21, 2025

Item 1	April 18, 2020**	(1654552)
Item 2	May 12, 2020**	(1661122)
Item 3*	June 17, 2020**	(1667652)
Item 4	July 13, 2020**	(1674600)
Item 5	August 28, 2020**	(1681372)
Item 6*	September 16, 2020**	(1687948)
Item 7	October 14, 2020**	(1678899)
Item 8*	October 15, 2020**	(1694296)
Item 9	November 16, 2020**	(1715519)
Item 10*	December 18, 2020**	(1715520)
Item 11	January 18, 2021**	(1715521)
Item 12*	February 19, 2021**	(1728591)
Item 13	March 20, 2021**	(1728592)
Item 14	April 07, 2021**	(1685877)
Item 15	April 20, 2021**	(1728593)
Item 16	May 17, 2021**	(1741590)
Item 17	June 18, 2021**	(1748114)
Item 18*	July 13, 2021**	(1752722)
Item 19*	July 27, 2021**	(1738808)
Item 20*	August 19, 2021**	(1758135)
Item 21*	September 20, 2021**	(1767390)
Item 22*	October 19, 2021**	(1777849)
Item 23*	November 20, 2021**	(1784644)
Item 24*	December 17, 2021**	(1791678)
Item 25*	January 17, 2022**	(1799520)
Item 26*	February 09, 2022**	(1807352)
Item 27*	March 18, 2022**	(1814403)
Item 28*	April 20, 2022**	(1820974)
Item 29*	May 16, 2022**	(1829807)
Item 30*	June 14, 2022**	(1836107)
Item 31*	July 21, 2022**	(1843306)
Item 32*	August 15, 2022**	(1849473)
Item 33	September 19, 2022**	(1857239)
Item 34*	October 18, 2022**	(1863595)
Item 35*	November 16, 2022**	(1870505)
Item 36*	December 02, 2022**	(1824226)
Item 37*	December 16, 2022**	(1876359)
Item 38*	January 19, 2023**	(1883173)
Item 39*	February 17, 2023**	(1890984)
Item 40*	March 20, 2023**	(1899556)
Item 41*	April 18, 2023**	(1906359)

Item 42*	May 18, 2023**	(1913514)
Item 43*	June 19, 2023**	(1920122)
Item 44*	July 20, 2023**	(1927089)
Item 45*	August 15, 2023**	(1934053)
Item 46*	September 07, 2023**	(1940192)
Item 47*	October 19, 2023**	(1947030)
Item 48*	November 20, 2023**	(1952718)
Item 49*	December 20, 2023**	(1962492)
Item 50*	January 19, 2024**	(1969080)
Item 51	February 19, 2024**	(1978145)
Item 52*	March 19, 2024**	(1984718)
Item 53*	April 19, 2024**	(1991241)
Item 54*	May 20, 2024**	(1997696)
Item 55*	June 19, 2024**	(2004659)
Item 56*	July 19, 2024**	(2012205)
Item 57*	August 19, 2024**	(2017797)
Item 58*	September 18, 2024	(2024834)
Item 59	October 02, 2024	(2015854)
Item 60	October 04, 2024	(2016119)
Item 61*	October 18, 2024	(2030948)
Item 62	November 18, 2024	(2037264)
Item 63*	December 19, 2024	(2043650)
Item 64*	January 20, 2025	(2050215)

\* No violations documented during this investigation

\*\*Investigation applicable for the Compliance History Rating period between 09/01/2019 and 08/31/2024.

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN  
ENFORCEMENT ACTION  
CONCERNING  
SCHLUMBERGER TECHNOLOGY  
CORPORATION  
RN102805884

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

## AGREED ORDER DOCKET NO. 2024-1668-PWS-E

On \_\_\_\_\_, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding SCHLUMBERGER TECHNOLOGY CORPORATION (the "Respondent") under the authority of TEX. HEALTH & SAFETY CODE ch. 341. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent presented this Order to the Commission.

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

It is further understood and agreed that this Order represents the complete and fully-integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable. The duties and responsibilities imposed by this Order are binding upon the Respondent.

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

### I. FINDINGS OF FACT

1. The Respondent owns and operates a public water supply located at 14910 Airline Road in Rosharon, Brazoria County, Texas (the "Facility"). The Facility provides water for human consumption, has approximately 30 service connections, and serves at least 25 people per day for at least 60 days per year. As such, the Facility is a public water system as defined in 30 TEX. ADMIN. CODE § 290.38(73).
2. During a record review for the Facility conducted on September 23, 2024 through October 4, 2024, an investigator documented that the locational running annual average concentrations of total trihalomethanes ("TTHM") for Stage 2 Disinfection Byproducts at Site 1 were 0.087 milligrams per liter ("mg/L") for the first quarter of 2024, 0.085 mg/L for the second quarter of 2024, and 0.086 mg/L for the third quarter of 2024.
3. The Executive Director recognizes that by March 21, 2025, the Respondent returned to compliance with the maximum contaminant level ("MCL") for TTHM, based on the locational running annual average at the Facility.

## II. CONCLUSIONS OF LAW

1. As evidenced by Finding of Fact No. 1, the Respondent is subject to the jurisdiction of the TCEQ pursuant to TEX. HEALTH & SAFETY CODE ch. 341 and the rules of the TCEQ.
2. As evidenced by Finding of Fact No. 2, the Respondent failed to comply with the MCL of 0.080 mg/L for TTHM, based on the locational running annual average, in violation of 30 TEX. ADMIN. CODE § 290.115(f)(1) and TEX. HEALTH & SAFETY CODE § 341.0315(c).
3. Pursuant to TEX. HEALTH & SAFETY CODE § 341.049(a), the TCEQ has the authority to assess an administrative penalty against the Respondent for violations of state statutes within the TCEQ's jurisdiction, for violations of rules adopted under such statutes, or for violations of orders or permits issued under such statutes.
4. An administrative penalty in the amount of \$1,587 is justified by the facts recited in this Order and considered in light of the factors set forth in TEX. HEALTH & SAFETY CODE § 341.049(b). The Respondent paid the \$1,587 penalty.

## III. ORDERING PROVISIONS

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

1. The Respondent is assessed a penalty as set forth in Conclusion of Law No. 4 for violations of state statutes and rules of the TCEQ. The payment of this penalty and the Respondent's compliance with all the requirements set forth in this Order resolve only the matters set forth by this Order in this action. The Commission shall not be constrained in any manner from requiring corrective actions or penalties for violations that are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: SCHLUMBERGER TECHNOLOGY CORPORATION, Docket No. 2024-1668-PWS-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 Facility 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. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms in this Order.
6. 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.
7. 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.
8. 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.
9. 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

*Kristi Mayo-Jurack*

07/16/2025

-----  
For the Executive Director

-----  
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.

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Signature

-----  
Date

*Bahar E. Romman*

4/3/2025  
*SRC Center Manager*

-----  
Name (Printed or typed)  
Authorized Representative of  
SCHLUMBERGER TECHNOLOGY CORPORATION

-----  
Title

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

**Instructions:** Send the original, signed Order with penalty payment to the Financial Administration Division, Revenue Operations Section at the address in Ordering Provision 1 of this Order.