

**From:** [David Ramirez](#)  
**To:** [REDACTED]  
**Cc:** [Ramiro Garcia](#); [Anita Keese](#); [OCE](#)  
**Subject:** RE: COVID19 Regulatory Relief Requests - Please Read on Behalf of the Office of Compliance and Enforcement  
**Date:** Tuesday, March 24, 2020 9:43:05 AM

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Good morning Ms. McCracken and Mr. Crowell,

The TCEQ has received your request for enforcement discretion to postpone leak detection and repair (LDAR) programs for three facilities operated by Navitas Midstream Midland Basin LLC. The facilities and associated rule cites for which enforcement discretion has been requested are listed below:

1. Taylor Gas Plant (RN110371002) – NRSP 151492, SOP O4145: SOP Condition No. 8 and NRSP (c)(2)(B) – NSPS Subpart OOOOa
2. Newberry Gas Plant (RN109272526) – NRSP 141647, SOP O3959: SOP Condition No. 8 and NRSP (c)(2)(B) – NSPS Subpart OOOOa
3. Spraberry Gas Plant (RN100224823) – NSR 5665A, PBR 35535, SOP O2560:
  - a. SOP Condition No. 9 and NSR 5665A Condition No. 10 – NSPS Subpart KKK
  - b. SOP Condition No. 1E – MACT Subpart HH

Your request is approved in accordance with the representations in your request for 3 months and is effective from the date of this email. The TCEQ remains committed to working with our regulated community on a case by case basis and reserves the right to withdraw this approval.

Regards,  
David A. Ramirez, Area Director  
Border and Permian Basin Area  
Texas Commission on Environmental Quality

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**From:** McCracken, Michelle <[REDACTED]>  
**Sent:** Monday, March 23, 2020 9:28 AM  
**To:** OCE <[OCE@tceq.texas.gov](mailto:OCE@tceq.texas.gov)>; Ramiro Garcia <[ramiro.garcia@tceq.texas.gov](mailto:ramiro.garcia@tceq.texas.gov)>  
**Cc:** Zachary Crowell <[REDACTED]>  
**Subject:** FW: COVID19 Regulatory Relief Requests - Please Read on Behalf of the Office of Compliance and Enforcement

Dear Office of Compliance and Enforcement,

Navitas Midstream Midland Basin, LLC owns and operates the following facilities subject to leak detection and repair (LDAR) programs.

1. Taylor Gas Plant (RN110371002) – NRSP 151492, SOP O4145
2. Newberry Gas Plant (RN109272526) – NRSP 141647, SOP O3959
3. Spraberry Gas Plant (RN100224823) – NSR 5665A, PBR 35535, SOP O2560

The LDAR programs at the facilities listed above require a team of outside contractors to visit the applicable facilities monthly and work in close quarters with Navitas employees to detect and repair

leaks. In an effort to comply with CDC guidelines and protect Navitas employees, Navitas requests enforcement discretion with regards to the timing of the LDAR inspections at the above facilities for a period of 3 months or such time that the CDC guidelines change regarding COVID-19. Navitas employees will continue to repair any leaks discovered during daily walkthroughs of the facilities and Navitas feels that the overall environmental impact from this request for enforcement discretion will be minimal.

Navitas will maintain records demonstrating which periods were skipped during this requested period and will note them as such in the required semi annual deviation reports. The following are the applicable rules/permit provisions for each site which enforcement discretion is requested.

1. Taylor Gas Plant
  - a. SOP Condition No. 8 and NRSP (c)(2)(B) – NSPS Subpart OOOOa
2. Newberry Gas Plant
  - a. SOP Condition No. 8 and NRSP (c)(2)(B) – NSPS Subpart OOOOa
3. Spraberry Gas Plant
  - a. SOP Condition No. 9 and NSR 5665A Condition No. 10 – NSPS Subpart KKK
  - b. SOP Condition No. 1E – MACT Subpart HH

Please let us know if this request is approved and if you have any questions.

Thanks,

Zachary Crowell  
Assistant Air Group Manager  
o. 405-702-1598  
c. 405-206-0440

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**From:** McCracken, Michelle <[REDACTED]>  
**Sent:** Sunday, March 22, 2020 7:48 PM  
**To:** Zachary Crowell <[REDACTED]>  
**Subject:** Fwd: COVID19 Regulatory Relief Requests - Please Read on Behalf of the Office of Compliance and Enforcement

Can you please request enforcement discretion for Taylor and Newberry first thing tomorrow morning? We would like to hold off on LDAR for a couple of weeks to not expose our employees. Get [Outlook for iOS](#)

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**From:** Sheryl Jett <[REDACTED]>  
**Sent:** Thursday, March 19, 2020 11:27:37 AM  
**To:** Alice Ratcliffe ([REDACTED] <[REDACTED]> Amy Carl  
[REDACTED] <[REDACTED]> Amy Deweese  
[REDACTED] <[REDACTED]> Andrew Chartrand  
[REDACTED] <[REDACTED]> Andy Adams  
[REDACTED] <[REDACTED]> Anne Billingsley

[REDACTED] < [REDACTED] Anya McInnis  
[REDACTED] < [REDACTED] April Zapien  
[REDACTED] < [REDACTED] Benjamin Malotte  
[REDACTED] < [REDACTED] Bill Meyer  
[REDACTED] < [REDACTED] Bill Oswald  
[REDACTED] < [REDACTED] Bill Ward [REDACTED]  
< [REDACTED] Bill Wolf ([REDACTED])  
< [REDACTED] Brandi Naughton ([REDACTED])  
< [REDACTED] Bret Fox ([REDACTED])  
< [REDACTED] Casey Krause ([REDACTED]) < [REDACTED] Cathy  
Rourke ([REDACTED]) < [REDACTED] Celina Romero  
[REDACTED] < [REDACTED] Charles Bates ([REDACTED])  
< [REDACTED] Charles Wait ([REDACTED])  
< [REDACTED] Charles Yarbrough ([REDACTED])  
< [REDACTED] Chris Burnett ([REDACTED])  
< [REDACTED] Christian Goff ([REDACTED])  
< [REDACTED] Christopher Benton ([REDACTED]) < [REDACTED]  
Cindy Pate [REDACTED] < [REDACTED] Cindy Van  
Cleave ([REDACTED]) < [REDACTED] Clark White  
[REDACTED] < [REDACTED] Claudio Galli  
[REDACTED] < [REDACTED] Clint Cowan  
[REDACTED] < [REDACTED] Clint Duty  
[REDACTED] < [REDACTED] Cris Castillo  
[REDACTED] < [REDACTED] Damien Forneris  
[REDACTED] < [REDACTED] Damien Watt ([REDACTED])  
< [REDACTED] Dan Hyvl [REDACTED] < [REDACTED]  
Daniel Schnee ([REDACTED]) < [REDACTED] Danny  
Nichols [REDACTED] < [REDACTED] Dave Perkins  
[REDACTED] < [REDACTED] David McQuade  
[REDACTED] < [REDACTED] Wilhelm, David  
< [REDACTED] Dawn Coufal [REDACTED]  
< [REDACTED] Deena Jordan ([REDACTED])  
< [REDACTED] Delbert Fore ([REDACTED]) < [REDACTED] Denise  
Adams ([REDACTED]) < [REDACTED] Devin Hotzel  
[REDACTED] < [REDACTED] Dirk Cockrum  
[REDACTED] < [REDACTED] Don Anderson  
[REDACTED] < [REDACTED] Don Lewis  
[REDACTED] < [REDACTED] Edward "Trey" Moeller  
[REDACTED] < [REDACTED] Elizabeth Hawkins  
[REDACTED] < [REDACTED] Eric Amundsen  
[REDACTED] < [REDACTED] Eric Tiemeyer  
[REDACTED] < [REDACTED] Ervin Thomas  
[REDACTED] < [REDACTED] Geoff Renberg ([REDACTED])  
< [REDACTED] Gonca Randall ([REDACTED])  
< [REDACTED] Grant Ruckel ([REDACTED])

< [REDACTED] Greg Clark ([REDACTED])  
< [REDACTED] Greg Schnacke ([REDACTED])  
< [REDACTED] Haley O'Neill ([REDACTED]) < [REDACTED] Ing,  
Leigh ([REDACTED]) < [REDACTED] Jaime White ([REDACTED])  
< [REDACTED] James Mann ([REDACTED]) < [REDACTED]  
Jason Lee ([REDACTED]) < [REDACTED] Jason  
Zapalac ([REDACTED]) < [REDACTED] Jeannine Wheeler  
([REDACTED]) < [REDACTED] Jeff Allison  
([REDACTED]) < [REDACTED] Jeff Bonham  
([REDACTED]) < [REDACTED] Jeff Culver  
([REDACTED]) < [REDACTED] Jeff Hardgrave  
([REDACTED]) < [REDACTED] Jeff Jackson  
([REDACTED]) < [REDACTED] Jeff Pedderson  
([REDACTED]) < [REDACTED] Jennifer Ashcraft  
([REDACTED]) < [REDACTED] Jennifer Frazier ([REDACTED])  
< [REDACTED] Jennifer P. Street ([REDACTED])  
< [REDACTED] Jennifer Shea ([REDACTED])  
< [REDACTED] Jessica Keiser ([REDACTED])  
< [REDACTED] Jessica O'Brien ([REDACTED])  
< [REDACTED] Jessica Toll ([REDACTED])  
< [REDACTED] Jim Rudd ([REDACTED])  
< [REDACTED] Jim Wright ([REDACTED])  
< [REDACTED] Jimmie Hammontree ([REDACTED])  
< [REDACTED] JoAnn Russell ([REDACTED])  
< [REDACTED] Joey Rockett ([REDACTED])  
< [REDACTED] John Admire ([REDACTED])  
< [REDACTED] John Arnold ([REDACTED])  
< [REDACTED] John Collins ([REDACTED])  
< [REDACTED] John Holcomb ([REDACTED])  
< [REDACTED] Jon Fields ([REDACTED]) < [REDACTED]  
Jonathan Sanwald ([REDACTED]) < [REDACTED] Josh  
Franks ([REDACTED]) < [REDACTED] Julia Knezek  
([REDACTED]) < [REDACTED] Julie Pabon  
([REDACTED]) < [REDACTED] Julie Williams  
([REDACTED]) < [REDACTED] Karen Nielson  
([REDACTED]) < [REDACTED] Katherine O'Connor  
([REDACTED]) < [REDACTED] Keith Wall  
([REDACTED]) < [REDACTED] Kelly McBeth  
([REDACTED]) < [REDACTED] Kenny Singleton  
([REDACTED]) < [REDACTED] Kevin Dahncke  
([REDACTED]) < [REDACTED] Kevin Hendricks  
([REDACTED]) < [REDACTED] Kimberly Landry  
([REDACTED]) < [REDACTED] Kristen  
Jones ([REDACTED]) < [REDACTED] Kristin Evanyo  
([REDACTED]) < [REDACTED] Krystina Parker

[REDACTED] < [REDACTED] Kyle Stephens ([REDACTED])  
< [REDACTED] Lance Lodes ([REDACTED])  
< [REDACTED] Laura Guthrie ([REDACTED])  
< [REDACTED] Laura Weber ([REDACTED])  
< [REDACTED] Linda Abernathy ([REDACTED])  
< [REDACTED] Lindsey Miller ([REDACTED]) < [REDACTED]  
Lisa Nishimuta ([REDACTED]) < [REDACTED] Lynn Ward  
([REDACTED]) < [REDACTED] Mackie McCrea  
([REDACTED]) < [REDACTED] Maria Valdez  
([REDACTED]) < [REDACTED] Marina Turati ([REDACTED])  
< [REDACTED] Marise Textor ([REDACTED])  
< [REDACTED] Mark Davis ([REDACTED])  
< [REDACTED] Matt Comeaux ([REDACTED])  
< [REDACTED] Matt Hite ([REDACTED]) < [REDACTED]  
Matt McCauley ([REDACTED]) < [REDACTED] Melanie  
Roberts ([REDACTED]) < [REDACTED] Melissa Lambert  
([REDACTED]) < [REDACTED] Michael Johns  
([REDACTED]) < [REDACTED] Michael Smith  
([REDACTED]) < [REDACTED] McCracken, Michelle  
< [REDACTED] Mindi Kral ([REDACTED])  
< [REDACTED] Mitch Lagerstrom ([REDACTED])  
< [REDACTED] Mollie Schall ([REDACTED])  
< [REDACTED] Moshe Wolfe ([REDACTED])  
< [REDACTED] Nadia Kyrlova ([REDACTED])  
< [REDACTED] Oliver Scofield ([REDACTED])  
< [REDACTED] Oracio Estrada ([REDACTED])  
< [REDACTED] Pam Phillips ([REDACTED]) < [REDACTED]  
Pat Holcomb ([REDACTED]) < [REDACTED] Paul Reinermann  
([REDACTED]) < [REDACTED] Paul Witkowski  
([REDACTED]) < [REDACTED] Perrin Wall  
([REDACTED]) < [REDACTED] Peter Abt  
([REDACTED]) < [REDACTED] Peter Trombley  
([REDACTED]) < [REDACTED] Phil Gamble ([REDACTED])  
< [REDACTED] Prasad Tamminayana ([REDACTED])  
< [REDACTED] Quentin Mendenhall  
([REDACTED]) < [REDACTED] Rachel Trainer  
([REDACTED]) < [REDACTED] Randall Burdorf  
([REDACTED]) < [REDACTED] Randy Robichaux  
([REDACTED]) < [REDACTED] Richard Myers  
([REDACTED]) < [REDACTED] Rick Bye ([REDACTED])  
< [REDACTED] Rick Dietz ([REDACTED])  
< [REDACTED] Robbie McDonough ([REDACTED])  
< [REDACTED] Rodney Sartor ([REDACTED])  
< [REDACTED] Roger Thompson ([REDACTED]) < [REDACTED]  
Ronald Speer ([REDACTED]) < [REDACTED] Rusty Shaw

[REDACTED] <[REDACTED]> Sam Keen ([REDACTED])  
<[REDACTED]> Sara Feucht ([REDACTED])  
<[REDACTED]> Shawn Fullingim ([REDACTED])  
<[REDACTED]> Shayne Woodard ([REDACTED])  
<[REDACTED]> Shelley Ragsdale ([REDACTED]) <[REDACTED]>  
Sherry Burse ([REDACTED]) <[REDACTED]> Skip Wedel ([REDACTED])  
[REDACTED] <[REDACTED]> Stacy Duke ([REDACTED])  
[REDACTED] <[REDACTED]> Steve Falgoust ([REDACTED])  
[REDACTED] <[REDACTED]> Steve Lomax ([REDACTED])  
<[REDACTED]> Steve Perry ([REDACTED]) <[REDACTED]> Tamara  
Robbins ([REDACTED]) <[REDACTED]> Thure Cannon ([REDACTED])  
<[REDACTED]> Tim Manning ([REDACTED])  
<[REDACTED]> Tom Meriwether ([REDACTED])  
<[REDACTED]> Tom Safley ([REDACTED])  
<[REDACTED]> Tom Sellers ([REDACTED])  
<[REDACTED]> Travis Ray ([REDACTED])  
<[REDACTED]> Victoria Wagner ([REDACTED])  
<[REDACTED]> Vincent DiCosimo ([REDACTED])  
<[REDACTED]> Warren Fusilier ([REDACTED])  
<[REDACTED]> Wayne Roberts ([REDACTED]) <[REDACTED]> Will  
Nipper ([REDACTED]) <[REDACTED]> Will Yenke ([REDACTED])  
<[REDACTED]> Zachary Craft ([REDACTED]) <[REDACTED]>

**Subject:** [EXTERNAL] FW: COVID19 Regulatory Relief Requests - Please Read on Behalf of the Office of Compliance and Enforcement

Further to our email last week regarding TCEQ enforcement discretion for coronavirus-related compliance issues, the TCEQ Office of Compliance and Enforcement distributed the following notice yesterday:

**From the Office of Compliance and Enforcement**

With the onset of COVID-19 (coronavirus) and the Governor’s Proclamation of a state of disaster in Texas, the TCEQ is aware that regulated entities may be experiencing an impact from a reduced workforce necessary to maintain normal operations at some facilities. All regulated entities are encouraged to take all available actions necessary to ensure compliance with environmental regulations and permit requirements to protect the health and safety of Texans and the environment. However, in the instance that noncompliance is unavoidable directly due to impact from the coronavirus, an email box has been established by TCEQ to accept requests for potential enforcement discretion. Regulated entities should email both [OCE@tceq.texas.gov](mailto:OCE@tceq.texas.gov) and [Ramiro.Garcia@tceq.texas.gov](mailto:Ramiro.Garcia@tceq.texas.gov) with specific information related to enforcement discretion requests. The OCE (Office of Compliance & Enforcement) email box is monitored daily by multiple TCEQ staff who will ensure the requests are expeditiously addressed. The TCEQ’s goal is to provide a response to the regulated entity’s request within 24 to 48 hours.

The email to OCE should at a minimum include the following:

- Concise statement supporting request for enforcement discretion
- Anticipated duration of need for enforcement discretion
- Citation of rule / permit provision for which enforcement discretion is requested

Regulated entities must maintain records adequate to document activities related to the noncompliance under enforcement discretion, including details of the regulated entity's best efforts to comply.

Any questions regarding this guidance should be directed to the OCE email box and a response will be provided.

Sincerely,

Ramiro Garcia, Jr.

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