



REGION 6

DALLAS, TX 75270

May 28, 2025

Kimberly Landry
ESG and Regulatory Director
Vaquero Permian Gathering, LLC
2850 N. Harwood St., Suite 1200
Dallas, Texas 75201

Sent via email: kimberly.landry@vaqueromidstream.com

Re: Notice of Violation

Dear Ms. Landry:

The United States Environmental Protection Agency, Region 6 ("EPA") has identified Vaquero Permian Gathering, LLC ("Vaquero") as having violated the Clean Air Act ("CAA"). This Notice of Violation ("NOV") is issued to Vaquero¹ for violations of the CAA, 42 U.S.C. § 7401 *et seq.*, at the energy extraction and handling facility listed in the Enclosure (the "Facility"). EPA alleges violations of the CAA and the federally-approved Texas State Implementation Plan ("SIP") as incorporated into the Texas State Permits at the Facility, as listed in the Enclosure. By this letter, EPA is extending to you an opportunity to advise the Agency, via a conference call or in writing, of any further information EPA should consider with respect to the violation.

This NOV is issued pursuant to Section 113(a)(1) of the CAA, 42 U.S.C. § 7413(a)(1). Section 113(a)(1) of the CAA, 42 U.S.C. § 7413(a)(1), requires the Administrator of the EPA to notify any person in violation of a SIP or permit of the violation, and this NOV serves as such notice. The authority to issue this NOV has been delegated to the Director of the Enforcement and Compliance Assurance Division, EPA Region 6.

EPA contracted helicopter flyovers for a portion of the Permian Basin from July 22, 2024, through August 19, 2024, to assess emission sources using Optical Gas Imaging ("OGI") technology. On October

¹ Please be advised that some companies may qualify as a "small business" under the Small Business Regulatory Enforcement and Fairness Act ("SBREFA"). The U.S. Small Business Administration has established a Table of Small Business Size Standards, which can be found at: <https://www.sba.gov/document/support-table-size-standards>. The SBREFA Information Sheet provides information on compliance assistance to entities that may qualify as small businesses as well as to inform them of their right to comment to the SBREFA Ombudsman concerning EPA enforcement activities. The SBREFA Information Sheet can be found at: <https://www.epa.gov/compliance/small-business-resources-information-sheet>.

25, 2024, EPA sent a letter informing Vaquero of potentially unauthorized emissions from a facility that EPA believed was owned/operated by Vaquero, along with an OGI video capture for the Facility. EPA asked Vaquero to verify ownership and take any necessary corrective action to address unauthorized hydrocarbon emissions at the Facility. EPA considered information provided by Vaquero to determine whether violations occurred at the Facility.

CAA Violations

We are sending this NOV to inform Vaquero of the following violations at the Facility:

Texas SIP Violations

1. Failure to comply with general requirements located at 30 Tex. Admin. Code §§ 116.615(2) and (9) and the TCEQ Non-Rule Standard Permit for Oil and Gas Facilities (e)(1); and
2. Tanks with unauthorized emissions in violation of requirements under the TCEQ Non-Rule Standard Permit for Oil and Gas Facilities (e)(5) and (e)(6).

Please review the specific violations and information we have provided in the Enclosure regarding the facility at issue.

Opportunity to Confer

This NOV provides you with the opportunity to confer with EPA. We request Vaquero contact Feven Ezra, Assistant Regional Counsel, at Ezra.Feven@epa.gov or (214) 665-2731 within ten (10) business days to discuss this pending matter.

Sincerely,

Cheryl T. Seager, Director
Enforcement and
Compliance Assurance Division

Enclosure

ec: Johnny Bowers, TCEQ (Johnny.Bowers@tceq.texas.gov)
Michael Miller, TCEQ (Michael.Miller@tceq.texas.gov)