



MICHELLE LUJAN GRISHAM
GOVERNOR

JAMES C. KENNEY
CABINET SECRETARY

SENT BY ELECTRONIC MAIL AND CERTIFIED MAIL
RETURN RECEIPT REQUESTED

1/27/2025

Jing Li and Jim Lieb
Enterprise Field Services, LLC
PO Box 4324
Houston, TX 77210
Sent by electronic mail to: jl@eprod.com and jl Lieb@eprod.com

Notice of Violation for Enterprise Field Services, LLC, Case No. ENT-0971-2301

Dear Jing Li and Jim Lieb,

The New Mexico Environment Department (“NMED”) has identified Enterprise Field Services, LLC (“Enterprise”) as having violated state and federal regulations for air quality. This Notice of Violation (“NOV”) is regarding the Largo Compressor Station (“Facility”) owned by Enterprise. The facility is twenty-two miles SE of Blanco, NM at 36.485394 N latitude and 107.557197 W longitude. The facility is identified in NMED records as AI #971 and AIRS #35-039-0002.

Pursuant to the NMED Delegation Order dated November 26, 2024, the Cabinet Secretary has delegated to the Air Quality Bureau (“AQB”) Chief the authority to seek administrative enforcement for alleged violations of the United States Clean Air Act, the New Mexico Air Quality Control Act, federal and state regulations, and the air quality permits issued thereunder. The AQB is the Bureau within the NMED responsible for identifying air quality violations.

This NOV is issued pursuant to NMSA 1978, Section 74-2-5.1(A), which states that NMED’s “investigations shall be reduced to writing if any enforcement action is contemplated, and a copy shall be furnished to the owner or occupants of the premises before the action is filed.”

Alleged Violations

On May 9, 2023, an AQB compliance inspector performed an onsite inspection of the facility. As a follow-up to the inspection, the inspector received records from the facility between June 13 and July 20, 2023. While reviewing the records, the investigator found evidence of the following violations of the Code of Federal Regulations (“CFR”) and the Facility’s permit:

1. **Failure to perform the required maintenance for Unit 1 and Unit 2 pursuant to 40 CFR 63, Subpart ZZZZ.** The facility did not perform thirteen (13) instances of required inspections and maintenance between August 17, 2021, and December 13, 2022, on reciprocating internal combustion engine Units 1 and 2.

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2. **Failure to perform Method 9 opacity measurements on Unit 5 and Unit 6 once every 12 months of operation pursuant to NSR Permit 1591-M5-R6, Specific Condition A111.B.** In 2021 and 2022, the facility performed opacity tests for diesel generator engine Units 5 and 6 on August 23, 2021, and September 7, 2022, which are more than 12 months apart.
3. **Failure to complete recordkeeping required to demonstrate compliance with routine and predictable startup, shutdown, and maintenance (SSM) emission limits pursuant to NSR Permit 1591-M5-R6, Specific Condition B109.C (2).** Facility records show two instances of incorrect or missing information for SSM events. An event from March 31, 2022, described an “[u]nexpected engine shutdown” as routine or predictable, and an event from April 4, 2022, had no description of its cause.
4. **Failure to complete the recordkeeping required to demonstrate compliance with malfunction emission limits pursuant to NSR Permit 1591-M5-R6, Specific Condition B109.C (3).** For the malfunction of Unit 2 that occurred on February 12, 2022, the facility did not include a description or reason for the event.

Please note that the facility will appear on NMED’s Enforcement Watch as a result of this NOV (see: <https://www.env.nm.gov/enforcement-watch/>). Further, NMED may issue a press release to local media highlighting your facility as appearing on this webpage. Your facility will remain on the Enforcement Watch website as an active matter until this matter is fully resolved, including the payment of the assessed civil penalty.

You may obtain a copy of the AQB’s Civil Penalty Policy located on the Compliance and Enforcement website at: <https://www.env.nm.gov/air-quality/compliance-and-enforcement/>.

Requested Information

In response to this NOV, please provide this information for each alleged violation:

1. A description of the cause of the violation.
2. Documentation of the steps taken to correct the violation to date.
3. Documentation of steps taken or to be taken to prevent the recurrence of the violation.

With the documentation, please include specific, measurable, and time-bound changes made or to be made addressing any problems causing the violations. To settle this case, the information needs to show that the alleged violations have ended or will be ended in a reasonable amount of time. An attachment has been included at the end of the NOV and can be used as a checklist for organizing the response.

Use these instructions to submit the response:

1. All correspondence pertaining to this NOV must be submitted under cover of a properly completed Reporting Submittal Form, emailed to the Enforcement Specialist (contact information below). A copy of the form can be found online at: <https://www.env.nm.gov/air-quality/compliance-and-enforcement/>
2. Submit requested information no later than thirty (30) days after the date of this NOV.
3. Any documents claimed as Confidential Business Information (CBI) pursuant to 20.2.1.115 NMAC must be submitted in separate electronic files from non-CBI documents and identified as CBI.

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4. If files cannot be submitted by electronic mail, contact the Enforcement Specialist to request a link to a file transfer platform, or submit records on a thumb drive mailed to the Air Quality Bureau, 525 Camino de los Marquez, Suite 1, Santa Fe, NM 87505 to the attention of Charles Butler.
5. Please include any facts, information, or documentation to refute the alleged violations, with the requested information.

After receiving the response to this NOV, NMED may send a settlement offer or compliance order outlining the penalties and corrective actions associated with each of the violations. As NMED's review of the alleged violations is ongoing, NMED reserves the right to assert additional violations at the facility if new information becomes available.

If you have questions or believe any statement in this notice is erroneous, please contact Charles Butler, Enforcement Specialist, at (505) 660-6110 or charles.butler@env.nm.gov. If you are represented by counsel, please contact Chris Vigil, Assistant General Counsel, at (505) 469-4696 or christopherj.vigil@env.nm.gov.

Thank you for your prompt attention to this matter.

Sincerely,

DocuSigned by:
Cindy Hollenberg
8C5B75B327A8482...

Cindy Hollenberg
Bureau Chief
Air Quality Bureau

cc: Chris Vigil, OGC
Charles Butler, AQB

Attachment

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Attachment

This form must be completed and signed by the facility's Responsible Official (Title V) or other designee and returned no later than thirty (30) days after the date of this Notice of Violation. Documentation for additional information (in addition to this form) must be submitted electronically to Enforcement Specialist Charles Butler at charles.butler@env.nm.gov.

All submittals must be submitted using the Reporting Submittal Form. The Reporting Submittal Form and instructions can be located at: <https://www.env.nm.gov/air-quality/compliance-and-enforcement/#>.

I hereby verify that Enterprise Field Services, LLC has initiated the required additional information response outlined in this Notice of Violation. The following information has been submitted or will be submitted by the dates indicated below for each violation. All required documentation will be submitted electronically no later than thirty (30) days after the date of this Notice of Violation.

Date NOV received: _____

Alleged Violation 1

- _____ *A description of the cause of the violation*
- _____ *Documentation of the steps taken to correct the violation to date*
- _____ *Documentation of steps taken (or to be taken) to prevent recurrence of this violation (include date if not yet completed)*

Alleged Violation 2

- _____ *A description of the cause of the violation*
- _____ *Documentation of the steps taken to correct the violation to date*
- _____ *Documentation of steps taken (or to be taken) to prevent recurrence of this violation (include date if not yet completed)*

Alleged Violation 3

- _____ *A description of the cause of the violation*
- _____ *Documentation of the steps taken to correct the violation to date*
- _____ *Documentation of steps taken (or to be taken) to prevent recurrence of this violation (include date if not yet completed)*

Alleged Violation 4

- _____ *A description of the cause of the violation*
- _____ *Documentation of the steps taken to correct the violation to date*
- _____ *Documentation of steps taken (or to be taken) to prevent recurrence of this violation (include date if not yet completed)*

Signature

Date

Printed Name:

Title: