



MICHELLE LUJAN GRISHAM
GOVERNOR

JAMES C. KENNEY
CABINET SECRETARY

SENT BY ELECTRONIC MAIL AND CERTIFIED MAIL
RETURN RECEIPT REQUESTED

June 27, 2025

Jon Fields
Enterprise Delaware Basin Treating LLC
PO Box 4324
Houston, Texas 77210
Sent by electronic mail to: jefields@eprod.com

Notice of Violation for Enterprise Delaware Basin Treating LLC, PIN-39955-2401

Dear Jon Fields,

The New Mexico Environment Department ("NMED") has identified Pinon Midstream LLC ("Pinon") as having violated state and federal regulations for air quality. This Notice of Violation (NOV) is regarding the White Horse Compressor Station ("Facility") now owned by Enterprise Delaware Basin Treating LLC ("Enterprise"). Enterprise acquired Pinon Midstream LLC on October 28, 2024. This facility is 7.5 miles southeast of Jal, at latitude 32.018473 and longitude -103.258354 in Lea County, New Mexico, 88252, and is assigned Agency Interest (AI)# 39955 and AIRS# 350252055.

Pursuant to the NMED Delegation Order dated June 23, 2025, the Cabinet Secretary ("Secretary") has delegated to the Environmental Protection Compliance and Enforcement Bureau ("EPCEB") Chief the authority to seek administrative enforcement for alleged violations of the United States Clean Air Act ("CAA"), the New Mexico Air Quality Control Act ("AQCA"), federal and state regulations, and the air quality permits issued thereunder. The EPCEB 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 October 17, 2024, an NMED enforcement specialist collected the evidence to support this NOV during a review of Excess Emission Reports (EERs) submitted by Enterprise through the Air Quality Bureau Compliance Reporting application (AQBCR). The review found evidence of the following two (2) violations:

1. Failure to meet permitted allowable emission limits for regulated pollutants pursuant to GCP-O&G Permit Number 9184M2, Specific Conditions A106 and A107.

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Between August 30, 2021, and November 28, 2023, Pinon submitted the final EER through AQBCR for Activity number 039955-02282024-02. The event released 16 pounds of PM, and 3,040 pounds of H₂S in excess emissions.

2. Failure to submit Final EER within the timelines defined in 20.2.7.110.A (2) NMAC.
Pinon submitted the Final EER ninety-one (91) days late for activity number 039955-02282024-02 through AQBCR.

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 Civil Penalty Policy located on the Compliance and Enforcement website at: <https://www.env.nm.gov/air-quality/compliance-and-enforcement/>.

Requested Information

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

1. An explanation of excess emissions events lasting more than ten (10) days.
2. Documentation of steps taken or to be taken to prevent the recurrence of the violation.
3. A description of the cause of late EER submissions and record keeping failures.
4. Documentations of steps taken or to be taken to prevent the recurrence of late excess emission report submissions.

With the documentation, please include specific, measurable, and time-bound changes made or to be made addressing any problems causing the violations. Attachment A 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.
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 Valerie Sanchez.
5. Please include any facts, information, or documentation to refute the alleged violations, with the requested information.

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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 Valerie Sanchez, Enforcement Specialist, at (505) 660-4317 or valerie.sanchez@env.nm.gov or Kane Currans, Enforcement Supervisor, at (505) 629-8807 or kane.currans@env.nm.gov. If you are represented by counsel, please contact Christopher 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:

B6670F9997CB4CA...

Bruce Baizel
Division Director
Compliance and Enforcement Division

cc: Christopher Vigil, OGC
Kane Currans, Enforcement Supervisor, AQB
Valerie Sanchez, Enforcement specialist, AQB

Attachments

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Attachment A

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 Valerie Sanchez at valerie.sanchez@env.nm.gov or Enforcement Supervisor Kane Currans at kane.currans@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 Pinon/Enterprise Delaware Basin Treating 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

_____ *An explanation of excess emission events lasting more than ten (10) days.*

_____ *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 late EER submissions and record keeping failures.*

_____ *Documentations of steps taken (or to be taken) to prevent the recurrence of late excess emission report submissions.*

Signature

Date

Printed Name:

Title: