STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF: * Settlement Tracking No. 
TRANSCONTINENTAL GAS PIPE LINE * SA-AE-20-0028
COMPANY, LLC * 
AI # 2565 * Enforcement Tracking No. 
* AE-CN-15-00350

PROCEEDINGS UNDER THE LOUISIANA *
ENVIRONMENTAL QUALITY ACT *
L.A. R.S. 30:2001, ET SEQ. *

SETTLEMENT

The following Settlement is hereby agreed to between Transcontinental Gas Pipe Line
Company, LLC ("Respondent") and the Department of Environmental Quality ("DEQ" or "the
Department"), under authority granted by the Louisiana Environmental Quality Act, L.R.S.
30:2001, ET SEQ. ("the Act").

I

Respondent is a limited liability company that owns and/or operates a natural gas
compressor station located in Greensburg, St. Helena Parish, Louisiana ("the Facility").

II

On December 16, 2016, the Department issued to Respondent a Consolidated Compliance
Order & Notice of Potential Penalty, Enforcement No. AE-CN-15-00350 (Exhibit 1).

III

Respondent denies it committed any violations or that it is liable for any fines, forfeitures
and/or penalties.
IV

Nonetheless, Respondent, without making any admission of liability under state or federal statute or regulation, agrees to pay, and the Department agrees to accept, a payment in the amount of TWO THOUSAND SEVEN HUNDRED FIFTY AND NO/100 DOLLARS ($2,750.00), of which Seven Hundred Seventy-Two and 70/100 Dollars ($772.70) represents the Department's enforcement costs, in settlement of the claims set forth in this agreement. The total amount of money expended by Respondent on cash payments to the Department as described above, shall be considered a civil penalty for tax purposes, as required by La. R.S. 30:2050.7(E)(1).

V

Respondent further agrees that the Department may consider the inspection report(s), permit record(s), the Consolidated Compliance Order & Notice of Potential Penalty and this Settlement for the purpose of determining compliance history in connection with any future enforcement or permitting action by the Department against Respondent, and in any such action Respondent shall be estopped from objecting to the above-referenced documents being considered as proving the violations alleged herein for the sole purpose of determining Respondent's compliance history.

VI

This agreement shall be considered a final order of the Secretary for all purposes, including, but not limited to, enforcement under La. R.S. 30:2025(G)(2), and Respondent hereby waives any right to administrative or judicial review of the terms of this agreement, except such review as may be required for interpretation of this agreement in any action by the Department to enforce this agreement.
VII

This settlement is being made in the interest of settling the state's claims and avoiding for both parties the expense and effort involved in litigation or an adjudicatory hearing. In agreeing to the compromise and settlement, the Department considered the factors for issuing civil penalties set forth in La. R. S. 30:2025(E) of the Act.

VIII

As required by law, the Department has submitted this Settlement Agreement to the Louisiana Attorney General for approval or rejection. The Attorney General’s concurrence is appended to this Settlement Agreement.

IX

The Respondent has caused a public notice advertisement to be placed in the official journal of the parish governing authority in St. Helena Parish, Louisiana. The advertisement, in form and wording approved by the Department, announced the availability of this settlement for public view and comment and the opportunity for a public hearing. Respondent has submitted an original proof-of-publication affidavit and an original public notice to the Department and, as of the date this Settlement is executed on behalf of the Department, more than forty-five (45) days have elapsed since publication of the notice.

X

Payment is to be made within ten (10) days from notice of the Secretary's signature. If payment is not received within that time, this Agreement is voidable at the option of the Department. Payments are to be made by check, payable to the Department of Environmental Quality, and mailed or delivered to the attention of Accountant Administrator, Financial Services Division, Department of Environmental Quality, Post Office Box 4303, Baton Rouge, Louisiana,
Each payment shall be accompanied by a completed Settlement Payment Form (Exhibit A).

XI

In consideration of the above, any claims for penalties are hereby compromised and settled in accordance with the terms of this Settlement.

XII

Each undersigned representative of the parties certifies that he or she is fully authorized to execute this Settlement Agreement on behalf of his or her respective party, and to legally bind such party to its terms and conditions.
TRANSCONTINENTAL GAS PIPE LINE COMPANY, LLC

BY: __________________________
    (Signature)

GLEN JASEK
    (Printed)

TITLE: VP & GM

THUS DONE AND SIGNED in duplicate original before me this 30th day of
       June, 2020, at Houston, Texas.

NOTARY PUBLIC (ID # 424934581)
    (stamped or printed)

LOUISIANA DEPARTMENT OF
ENVIRONMENTAL QUALITY
Chuck Carr Brown, Ph.D., Secretary

BY: __________________________
    Lourdes Iturralde, Assistant Secretary
    Office of Environmental Compliance

THUS DONE AND SIGNED in duplicate original before me this 14th day of
       September, 2020, at Baton Rouge, Louisiana.

NOTARY PUBLIC (ID # 92503)
    (stamped or printed)

Approved: __________________________
           Lourdes Iturralde, Assistant Secretary

SA-AE-20-0028
State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE
December 16, 2016

CERTIFIED MAIL (7004 2510 0006 3853 1960)
RETURN RECEIPT REQUESTED

TRANSCONTINENTAL GAS PIPE LINE COMPANY, LLC
c/o C T Corporation System
Agent for Service of Process
3867 Plaza Tower Drive
Baton rouge, LA 70816

RE: CONSOLIDATED COMPLIANCE ORDER
& NOTICE OF POTENTIAL PENALTY
ENFORCEMENT TRACKING NO. AE-CN-15-00350
AGENCY INTEREST NO. 2565

Dear Sir/Madam:

Pursuant to the Louisiana Environmental Quality Act (La. R.S. 30:2001, et seq.), the attached CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY is hereby served on TRANSCONTINENTAL GAS PIPE LINE COMPANY, LLC (RESPONDENT) for the violations described therein.

Compliance is expected within the maximum time period established by each part of the COMPLIANCE ORDER. The violations cited in the CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY could result in the issuance of a civil penalty or other appropriate legal actions.

Any questions concerning this action should be directed to Lauren Upton at 225-219-3093 or via email at lauren.upton@la.gov.

Sincerely,

[Signature]
Celéna J. Cage
Administrator
Enforcement Division

CJC/LAU/lau
Alt ID No.
Attachment

Post Office Box 4312 • Baton Rouge, Louisiana 70821-4312 • Phone 225-219-3715 • Fax 225-219-3708
www.deq.louisiana.gov
c: Transcontinental Gas Pipe Line Company, LLC
Post Office Box 1396
Houston, TX 77251
STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE

IN THE MATTER OF

TRANSCONTINENTAL GAS PIPE LINE
COMPANY, LLC

ST. HELENA PARISH
ALT ID NO. 2540-00027

PROCEEDINGS UNDER THE LOUISIANA
ENVIRONMENTAL QUALITY ACT,

ENFORCEMENT TRACKING NO.
AE-CN-15-00350

AGENCY INTEREST NO.
2565

CONSOLIDATED
COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY

The following CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY is issued to TRANSCONTINENTAL GAS PIPE LINE COMPANY, LLC (RESPONDENT) by the Louisiana Department of Environmental Quality (the Department), under the authority granted by the Louisiana Environmental Quality Act (the Act), La. R.S. 30:2001, et seq., and particularly by La. R.S. 30:2025(C), 30:2050.2 and 30:2050.3(B).

FINDINGS OF FACT

1.

The Respondent owns and/or operates Compressor Station 65, a natural gas compressor station, located at 29507 Louisiana Highway 43 in Greensburg, St. Helena Parish, Louisiana (the facility). The facility operates or has operated under the following Title V Air Permits:

<table>
<thead>
<tr>
<th>PERMIT</th>
<th>ISSUE DATE</th>
<th>EFFECTIVE EXPIRATION DATE</th>
</tr>
</thead>
</table>
II.

On or about December 5, 2016, the Department conducted a file review to determine the Respondent's degree of compliance with the Act, the Air Quality Regulations, and all applicable permits from January 1, 2011 through December 31, 2014. While the Department's investigation is not yet complete, the following violations were noted during the course of the inspections and/or investigations:

A. According to verbal notification made to the Department on January 16, 2013 (T# 146070), the 2013 Annual Compliance Certification dated March 28, 2014, and correspondence dated January 27, 2015, the Respondent discovered dead vegetation near an underground natural gas pipeline on January 8, 2013. Subsequent excavation and investigation by the Respondent resulted in the detection of a flange leak. Several blowdowns were performed over the next several days in order to enact repairs. The line was ultimately repaired and secured on January 16, 2013. The reportable quantity was exceeded on January 10, 13, and 16, 2013, with releases of 15,754.747, 8,491.716, and 16,712.206 thousand standard cubic feet of natural gas, respectively. Between January 10 and 16, 2013, approximately 41.945 million standard cubic feet of natural gas was released. The failure to notify the Department of Public Safety within 24 hours of learning of the discharge is a violation of LAC 33:1.3917.A, LAC 33:III.501.C.4, Title V Permit No. 2540-00027-V2, and La. R.S. 30:2057(A)(1) and 30:2057(A)(2).

B. According to verbal notification made to the Department on January 16, 2013 (T# 146070), the 2013 Annual Compliance Certification dated March 28, 2014, and correspondence dated January 27, 2015, the Respondent discovered dead vegetation near an underground natural gas pipeline on January 8, 2013. Subsequent excavation and investigation by the Respondent resulted in the detection of a flange leak. Several blowdowns were performed over the next several days in order to enact repairs. The line was ultimately repaired and secured on January 16, 2013. The reportable quantity was exceeded on January 10, 13, and 16, 2013, with releases of 15,754.747, 8,491.716, and 16,712.206 thousand standard cubic feet of natural gas, respectively. Between January 10 and 16, 2013, approximately 41.945 million standard cubic feet of natural gas was released. The Department has no record of receiving a written report from the Respondent. The failure to submit written notification to the Department within seven (7) calendar days after the original incident notification is a violation of LAC 33:1.3925.A, LAC 33:III.501.C.4, Part
70 General Condition R.1, Louisiana General Condition XI.A, and

COMPLIANCE ORDER

Based on the foregoing, the Respondent is hereby ordered:

I.

To take, immediately upon receipt of this COMPLIANCE ORDER, any and all steps necessary
to meet and maintain compliance with the Air Quality Regulations.

II.

To submit, within thirty (30) days after receipt of this COMPLIANCE ORDER, an
unauthorized discharge report in accordance with LAC 33:III.3925.B describing the incident outlined in
Paragraphs II.A and II.B of the Findings of Fact.

III.

To submit to the Enforcement Division, within thirty (30) days after receipt of this
COMPLIANCE ORDER, a written report that includes a detailed description of the circumstances
surrounding the cited violations and actions taken or to be taken to achieve compliance with the Order
Portion of this COMPLIANCE ORDER. This report and all other reports or information required to
be submitted to the Enforcement Division by this COMPLIANCE ORDER shall be submitted to:

Office of Environmental Compliance
Post Office Box 4312
Baton Rouge, Louisiana 70821-4312
Attn: Lauren Upton
Re: Enforcement Tracking No. AE-CN-15-00350
Agency Interest No. 2565

THE RESPONDENT SHALL FURTHER BE ON NOTICE THAT:

I.

The Respondent has a right to an adjudicatory hearing on a disputed issue of material fact or of
law arising from this COMPLIANCE ORDER. This right may be exercised by filing a written request
with the Secretary no later than thirty (30) days after receipt of this COMPLIANCE ORDER.

II.

The request for an adjudicatory hearing shall specify the provisions of the COMPLIANCE
ORDER on which the hearing is requested and shall briefly describe the basis for the request. This
request should reference the Enforcement Tracking Number and Agency Interest Number, which are located in the upper right-hand corner of the first page of this document and should be directed to the following:

Department of Environmental Quality  
Office of the Secretary  
Post Office Box 4302  
Baton Rouge, Louisiana 70821-4302  
Attn: Hearings Clerk, Legal Division  
Re: Enforcement Tracking No. AE-CN-15-00350  
Agency Interest No. 2565

III.

Upon the Respondent's timely filing a request for a hearing, a hearing on the disputed issue of material fact or of law regarding this COMPLIANCE ORDER may be scheduled by the Secretary of the Department. The hearing shall be governed by the Act, the Administrative Procedure Act (La. R.S. 49:950, et seq.), and the Department's Rules of Procedure. The Department may amend or supplement this COMPLIANCE ORDER prior to the hearing, after providing sufficient notice and an opportunity for the preparation of a defense for the hearing.

IV.

This COMPLIANCE ORDER shall become a final enforcement action unless the request for hearing is timely filed. Failure to timely request a hearing constitutes a waiver of the Respondent's right to a hearing on a disputed issue of material fact or of law under Section 2050.4 of the Act for the violation(s) described herein.

V.

The Respondent's failure to request a hearing or to file an appeal or the Respondent's withdrawal of a request for hearing on this COMPLIANCE ORDER shall not preclude the Respondent from contesting the findings of facts in any subsequent penalty action addressing the same violation(s), although the Respondent is estopped from objecting to this COMPLIANCE ORDER becoming a permanent part of its compliance history.

VI.

Civil penalties of not more than twenty-seven thousand five hundred dollars ($27,500) for each day of violation for the violation(s) described herein may be assessed. For violations which occurred on August 15, 2004, or after, civil penalties of not more than thirty-two thousand five hundred dollars ($32,500) may be assessed for each day of violation. The Respondent's failure or refusal to comply with
this COMPLIANCE ORDER and the provisions herein will subject the Respondent to possible enforcement procedures under La. R.S. 30:2025, which could result in the assessment of a civil penalty in an amount of not more than fifty thousand dollars ($50,000) for each day of continued violation or noncompliance.

VII.

For each violation described herein, the Department reserves the right to seek civil penalties in any manner allowed by law, and nothing herein shall be construed to preclude the right to seek such penalties.

NOTICE OF POTENTIAL PENALTY

I.

Pursuant to La. R.S. 30:2050.3(B), you are hereby notified that the issuance of a penalty assessment is being considered for the violation(s) described herein. Written comments may be filed regarding the violation(s) and the contemplated penalty. If you elect to submit comments, it is requested that they be submitted within ten (10) days of receipt of this notice.

II.

Prior to the issuance of additional appropriate enforcement action(s), you may request a meeting with the Department to present any mitigating circumstances concerning the violation(s). If you would like to have such a meeting, please contact Lauren Upton at 225-219-3093 within ten (10) days of receipt of this NOTICE OF POTENTIAL PENALTY.

III.

The Department is required by La. R.S. 30:2025(E)(3)(a) to consider the gross revenues of the Respondent and the monetary benefits of noncompliance to determine whether a penalty will be assessed and the amount of such penalty. Please forward the Respondent’s most current annual gross revenue statement along with a statement of the monetary benefits of noncompliance for the cited violation(s) to the above named contact person within ten (10) days of receipt of this NOTICE OF POTENTIAL PENALTY. Include with your statement of monetary benefits the method(s) you utilized to arrive at the sum. If you assert that no monetary benefits have been gained, you are to fully justify that statement. If the Respondent chooses not to submit the requested most current annual gross revenues statement within ten (10) days, it will be viewed by the Department as an admission that the Respondent has the ability to pay the statutory maximum penalty as outlined in La. R.S. 30:2025.

IV.
The Department assesses civil penalties based on LAC 33:I.Subpart1.Chapter7. To expedite closure of this NOTICE OF POTENTIAL PENALTY portion, the Respondent may offer a settlement amount to resolve any claim for civil penalties for the violation(s) described herein. The Respondent may offer a settlement amount, but the Department is under no obligation to enter into settlement negotiations. The decision to proceed with a settlement is at the discretion of the Department. The settlement offer amount may be entered on the attached “CONSOLIDATED COMPLIANCE ORDER AND NOTICE OF POTENTIAL PENALTY REQUEST TO CLOSE” form. The Respondent must include a justification of the offer. DO NOT submit payment of the offer amount with the form. The Department will review the settlement offer and notify the Respondent as to whether the offer is or is not accepted.

V.

The NOTICE OF POTENTIAL PENALTY will not be closed if the Respondent owes outstanding fees to the Department. Please contact the Financial Services Division at 225-219-3865 or via email at _DEQ-WWWFinancialServices@la.gov to determine if you owe outstanding fees.

VI.

This CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY is effective upon receipt.

Baton Rouge, Louisiana, this 16th day of December, 2016.

[Signature]
Lourdes Ituralde
Assistant Secretary
Office of Environmental Compliance

Copies of a request for a hearing and/or related correspondence should be sent to:

Louisiana Department of Environmental Quality
Office of Environmental Compliance
Enforcement Division
P.O. Box 4312
Baton Rouge, LA 70821-4312
Attention: Lauren Upton
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL COMPLIANCE  
ENFORCEMENT DIVISION  
CONSOLIDATED COMPLIANCE ORDER &  
NOTICE OF POTENTIAL PENALTY  
REQUEST TO CLOSE  

<table>
<thead>
<tr>
<th>Enforcement Tracking No.</th>
<th>AE-CN-15-00350</th>
<th>Contact Name</th>
<th>Lauren Upton</th>
<th>Contact Phone No.</th>
<th>225-219-3093</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agency Interest (AI) No.</td>
<td>2565</td>
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<tr>
<td>Alternate ID No.</td>
<td>2540-00027</td>
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<tr>
<td>Respondent:</td>
<td>Transcontinental Gas Pipe Line Company, LLC</td>
<td>Facility Name:</td>
<td>Compressor Station 65</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>c/o C T Corporation system</td>
<td>Physical Location:</td>
<td>29507 Louisiana Highway 43</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Agent for Service of Process</td>
<td>City, State, Zip:</td>
<td>Greensburg, Louisiana 70441</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Post Office Box 1396</td>
<td>Parish:</td>
<td>St. Helena</td>
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<td></td>
<td>Houston, Texas 77251</td>
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**STATEMENT OF COMPLIANCE**

A written report was submitted in accordance with Paragraph II of the "Order" portion of the COMPLIANCE ORDER.

All necessary documents were submitted to the Department within 30 days of receipt of the COMPLIANCE ORDER in accordance with Paragraph III of the "Order" portion of the COMPLIANCE ORDER.

All necessary documents were submitted to the Department within 45 days of receipt of the COMPLIANCE ORDER in accordance with Paragraph(s) of the "Order" portion of the COMPLIANCE ORDER.

All necessary documents were submitted to the Department within 90 days of receipt of the COMPLIANCE ORDER in accordance with Paragraph(s) of the "Order" portion of the COMPLIANCE ORDER.

All items in the "Findings of Fact" portion of the COMPLIANCE ORDER were addressed and the facility is being operated to meet and maintain the requirements of the "Order" portion of the COMPLIANCE ORDER. Final compliance was achieved as of:

**SETTLEMENT OFFER (OPTIONAL)**

*(check the applicable option)*

---

The Respondent is not interested in entering into settlement negotiations with the Department with the understanding that the Department has the right to assess civil penalties based on LAC 33:1.Subpart1.Chapter7.

---

In order to resolve any claim for civil penalties for the violations in NOTICE OF POTENTIAL PENALTY (AE-CN-15-00350), the Respondent is interested in entering into settlement negotiations with the Department and would like to set up a meeting to discuss settlement procedures.

---

In order to resolve any claim for civil penalties for the violations in NOTICE OF POTENTIAL PENALTY (AE-CN-15-00350), the Respondent is interested in entering into settlement negotiations with the Department and offers to pay $__________ which shall include LDEQ enforcement costs and any monetary benefit of non-compliance.

---

- Monetary component = $__________
- Beneficial Environmental Project (BEP) component (optional) = $__________
- DO NOT SUBMIT PAYMENT OF THE OFFER WITH THIS FORM- the Department will review the settlement offer and notify the Respondent as to whether the offer is or is not accepted.
The Respondent has reviewed the violations noted in NOTICE OF POTENTIAL PENALTY (AE-CN-15-00350) and has attached a justification of its offer and a description of any BEPs if included in settlement offer.

<table>
<thead>
<tr>
<th>CERTIFICATION STATEMENT</th>
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<tbody>
<tr>
<td>I certify, under provisions in Louisiana and United States law that provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information attached and the compliance statement above, are true, accurate, and complete. I also certify that I do not owe outstanding fees or penalties to the Department for this facility or any other facility I own or operate. I further certify that I am either the Respondent or an authorized representative of the Respondent.</td>
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<thead>
<tr>
<th>Respondent’s Signature</th>
<th>Respondent’s Printed Name</th>
<th>Respondent’s Title</th>
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<tr>
<th>Respondent’s Physical Address</th>
<th>Respondent’s Phone #</th>
<th>Date</th>
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MAIL COMPLETED DOCUMENT TO THE ADDRESS BELOW:

Louisiana Department of Environmental Quality
Office of Environmental Compliance
Enforcement Division
P.O. Box 4312
Baton Rouge, LA 70821
Attn: Lauren Upton