

EHS&R Newsletter

FOURTH QUARTER 2023



SAFETY FIRST! FINISH STRONG

CAMS' commitment to safety is ingrained in our culture. Employees are encouraged to actively participate in safety initiatives, provide feedback on potential improvements, and take ownership of their safety and the safety of their colleagues. Our plants implement comprehensive training programs, perform regular safety drills, and vigilantly maintain awareness through daily safety briefings, specialized training sessions, and internal assessments.

In this issue, we highlight a milestone safety achievement at two CAMS facilities, announce the latest recipients of the EHS Excellence Award, and emphasize our safety focus through the CAMS Finish Strong campaign.



NEWS INSIDE

Finish Strong Campaign (Page 02)

ECMPS 2.0 Update (Page 04)

Enhanced Spill Response Program (Page 05)

Effective Materials Management Programs (Page 06)

Linden Station: Maximizing Beneficial Reuse Water (Page 08)

EHS Excellence Award Recipients (Page 10)

Year-end Snapshots (Page 12)

Griffith + Hamakua Celebrate Safety Milestones (Page 14)

Changes to Air Reporting Rule (Page 15)

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Finish Strong Campaign

By Ben Vodila, Vice President, Health & Safety



Santiago Sanchez, Deveon Power Plant Combustion Turbine Specialist, (right) hands a CAMS EHS Vision Hard Hat sticker to Brendan Varney, Control Room Operator.

As we approach 2024, let us intensify our commitment to safety, ensuring that every employee returns home safely each day. By staying focused, working together, and being proactive about safety, we can finish the year strong and set a positive precedent for the year to come. Remember, safety is a team effort, and every individual plays a crucial role in maintaining a safe work environment. Let's work together to make safety our top priority, ensuring the coming year is successful and incident-free at CAMS.

At this time of year, employees across all industries have the task of combatting the normal hazards on site along with the added distractions that winter and the holidays bring outside of work. Whether it's planning a family gathering at Thanksgiving, finances of traveling to visit loved ones, or searching for gifts for family members, thoughts and concerns about events outside of work can certainly add to the distractions our employees face while working safely on the job.

CAMS recognizes that distractions and fatigue can significantly contribute to workplace incidents, so it is crucial to remain vigilant considering the heightened risk of accidents. To help our employees stay focused during this period, CAMS rolled out our "Finish Strong" campaign to ensure our employees' minds stay focused on their present tasks. One element of this campaign was the distribution of CAMS EHS Vision stickers to all CAMS-operated plants.



Finish Strong Campaign (cont.)

To maintain a safe work environment, we remind everyone that it is imperative not to rush, remain focused on the task at hand, adhere strictly to procedures, communicate effectively, and engage in ongoing training. These are vital steps to ensuring all employees are fully prepared to perform their jobs safely. Some added external mental distractions include, but are not limited to:

1. **Family distractions:** Increased text messaging, hosting family visits, or traveling to see family.
2. **Inclement weather:** Slip, Trips and Falls are common in the winter months, and rushing at work in inclement weather only increases this hazard.
3. **Financial worries:** The holiday season, including the New Year, Christmas and Thanksgiving, often entails additional expenses due to festive meals and gift-giving.
4. **Fatigue:** Related to the celebrations, additional gatherings are typically joyful, but lead to less rest before a scheduled work shift. Fatigue can cause employees to lose focus on their tasks.



As we Effectively Manage Risks as part of our EHS Vision, acknowledging year-end distractions and ensuring safeguards are in place will help prevent incidents. Let's Finish Strong by:

- Staying focused on the task at hand, keeping both eyes and mind engaged.
- Refraining from cell phone use while performing job tasks.
- Keeping eyes on our path - walking is working.
- Ensuring adequate rest breaks.
- Actively holding each other accountable and exercising Stop Work Authority when a task cannot be completed safely.
- Working collaboratively as a team.
- Promptly correcting mistakes.
- Reporting positive safety observations.
- Conducting Job Safety Analyses (JSA) or Job Hazard Analyses (JHA).
- Adhering strictly to safety procedures.

ECMPS 2.0 Update

By Pat Yough, Environmental Services



On November 15, 2023, the Clean Air Markets Division branch of EPA announced that the scheduled major revision to EPA's Emissions Collection and Monitoring Plan Submission software ("ECMPS 2.0") would be delayed until a "future date." The move to ECMPS 2.0 will affect all ECMPS users.

ECMPS 2.0 was to implement a new data submittal format, make changes to various report schema, and incorporate additional reporting for sources that are required to submit data required by the Mercury and Air Toxics Standards ("MATS").

Since ECMPS 2.0 is being delayed, EPA will instead require several monitoring plans and reporting schema changes to the existing version of ECMPS, ECMPS 1.0, to include additional formulas, new emissions schema, and a daily NO_x limit. These changes are necessary for sources that are required to report Ozone Season NO_x emissions as part of the Good Neighbor Plan. CAMS Environmental Services issued a Good Neighbor Plan ("GNP") summary in the second quarter 2023 EHSR Newsletter. More information on the Good Neighbor Plan can be found at the following: [Good Neighbor Plan for 2015 Ozone NAAQS | US EPA](#). Changes to MATS reporting requirements will be accomplished using the PDF submission tool currently used to submit semi-annual MATS reports.

Data Acquisition and Handling System ("DAHS") providers CEMTEK and ESC Spectrum have stated that NetDAHS version 9.5 and StackVision version 7.5, respectively, will be modified to support these changes and will release the new versions once EPA provides the new schema changes and they have been properly tested. TML's RegPerfect and CISO's CeDAR are also reported to be prepared for the revisions to ECMPS 1.0. The changes to ECMPS 1.0 will need to be installed before the beginning of the first quarter 2024 reporting period on April 1, 2024.

CAMS Environmental Services will communicate additional updates as they become available. If you have any questions, please contact Pat Yough of CAMS eSPARC CEMS Support Services at pyough@camstex.com.

Enhanced Spill Response Program

By Ken Earl, Vice President, Operations, and Derek Furstenwerth, Senior Vice President, Environmental Services



CAMS operates or manages several oil-fired power plants subject to Oil Pollution Act (“OPA-90”) regulations. OPA-90 is administered by the United States Coast Guard (“USCG”) for potential oil releases involving the Waters of the United States, and the United States Environmental Protection Agency for releases to land. Both agencies employ the Incident Command System (“ICS”) to organize spill response and cleanup. As a leading power plant operator, and driven by CAMS Values, it is imperative that CAMS be highly capable in spill response and in deployment of ICS where appropriate. To this end, CAMS is proactively piloting a rigorous spill response program (“Program”) that includes enhanced training levels for plant and support employees with OPA-90 compliance responsibilities in two key areas: Hazardous Waste Operations and Emergency Response (“HAZWOPER”) procedures, and the ICS.

The first phase of the Program consisted of comprehensive 24-hour HAZWOPER training for all site personnel at multiple CAMS OPA-90 affected sites. This training elevated the competency levels of the employees from basic awareness to the “occasional worker” standard. Concurrently, ICS training was provided to managers and supervisors who could assume responsibility for implementing the ICS in the event of a release subject to OPA-90 requirements.

To further expand our commitment to preparedness, CAMS hired EMSI, Inc., a global leader in ICS training, to provide spill response support on an ad hoc basis and annual ICS training. EMSI has a rich history in ICS, with its founders participating in the original creation of ICS in the 1970s and developments since. Starting in 2024, EMSI’s involvement will extend to participating in annual spill response training drills mandated by USCG regulations, ensuring compliance, and offering additional ICS training opportunities for CAMS facility personnel. In addition to ICS support and training, EMSI’s role includes the review of existing Emergency Response Plans and spill response plans. Plan reviews were initiated at two plants in late 2023 and lessons learned will be used to further refine the CAMS Spill Response Program.

Sites subject to OPA-90 requirements have specific spill response and cleanup obligations, including:

- The capability to contain a spill (i.e., deploy boom), within one hour; and
- Contracting with an Oil Spill Response Organization (“OSRO”) that can respond within 2 hours to effectuate spill clean-up.

Recognizing potential risks associated with meeting the one-hour containment window while handling ongoing plant operations, CAMS decided to source spill response contractors to meet the 1-hour obligation as part of the Program.

CAMS is committed to being an industry leader in spill preparedness. With our focus on training and emergency drills and our partnership with EMSI, we are already delivering on that commitment and will continue to improve.

Effective Materials Management Programs

By Patrick Blanchard, Senior Director, Environmental Services



The CAMS Environmental Compliance Program establishes the minimum standards for managing environmental compliance for the CAMS Fleet. Part of the Environmental Compliance Program requires the CAMS Environmental Team to perform an annual environmental performance assessment for each operating facility. These assessments are a key component of a [Plan, Do, Check, and Act](#) process that fosters continuous improvement of CAMS environmental performance.

The scope of these annual assessments includes:

- Evaluation of compliance with regulatory requirements and recognized industry standards
- Risk factors from CAMS fleet, e.g., environmental events and near misses
- Implementation status of the elements of the CAMS Environmental Compliance Program.

The assessments performed in 2023 focused on materials management with a specific emphasis on site physical conditions. One common area of findings across the fleet relates to drum and tote storage for chemical products and waste materials. Proper drum storage practices reduce the risk of spills and streamline emergency response activities in the event of a spill or fire.

CAMS facilities with effective materials management programs implemented integrated housekeeping and inspections of storage areas into the daily assessment of operational readiness. This allows for rapid mitigation of deficiencies tracked as equipment maintenance needs. The following practices should be evaluated for all storage areas:

1

First-in, first-out (FIFO) inventory management to reduce the risk of deterioration of structure and labeling of containers. This will also reduce the need for waste disposal of products stored beyond their recommended shelf life.

2

Clear access and aiseways to allow ease of inspection of drum physical conditions. Crowded storage areas impede routine inspections and inhibit emergency response in the event of a spill.

3

Labeling needs to be readily visible to identify the contents of a leaking container without having to approach or contact the container.

Effective Materials Management Programs (cont.)

4

Containers should be stored away from floor drains or other water conveyances. The use of racks and or stands ensures the stability of containers and provides protection from physical contact by mobile equipment.

5

Spill containment pallets are a form of secondary containment. These use grating systems that allow for ease of inspection for leaks and are transportable for material removal in the event of a leak.

6

Ensure drum bungs and covers are in place during storage. This ensures that drum contents and any vapors are contained in the drum, protecting workers and the environment. Empty drums can still contain enough vapor to create a vapor exposure risk for employees and a potential fire and explosion. Rainwater infiltration into drums and totes can be eliminated by following these best practices.

Routine storage condition evaluation and feedback are key to a successful material management program. The most successful site programs included significant engagement by the management team through regular site reviews with their teams, the result of which was the trend away from identification of deficiencies to making proactive improvements in their waste and materials management programs.



Linden Station: Maximizing Beneficial Reuse Water

By Guy Rivera, EHS Manager



Linden Station is comprised of the co-located Linden CT and CC units. Linden CC consists of two separate 2X1 combined cycle units based on GE 7FA gas turbines, with a combined generating capacity of 1,300 MW. The plant is part of the Parkway Generation portfolio owned by an investment fund managed by ArcLight and is operated by CAMS.

Linden CC is located in an area designated by the Aqueduct Water Risk Atlas as a “high water risk” area based on water availability, water quality, and regulatory/reputational risk. In our 2022 Q3 EHSR Newsletter, we highlighted how the plant opted to use beneficial reuse water (BRUW) to minimize the environmental impact of its routine operations in this resource-constrained area.

Under high-load summer conditions, there is a need to augment the BRUW with city water. City

water, or potable water, must reliably meet stringent drinking water standards that are not necessarily required for industrial water use. As a result, compared to BRUW, it is costly and does not have the environmental benefit of being a recycled product. Partnering with a third-party vendor, Guy Rivera (EHS Manager), Keith Thomas (Operations Manager), Tom Fogarty (CAMS General Manager), and other stakeholders, an opportunity to reduce reliance on the city water through increased use of BRUW was identified. However, numerous challenges had to be addressed including compliance with the station’s permits, cooling tower water quality needs, source water quality, and pricing structures.

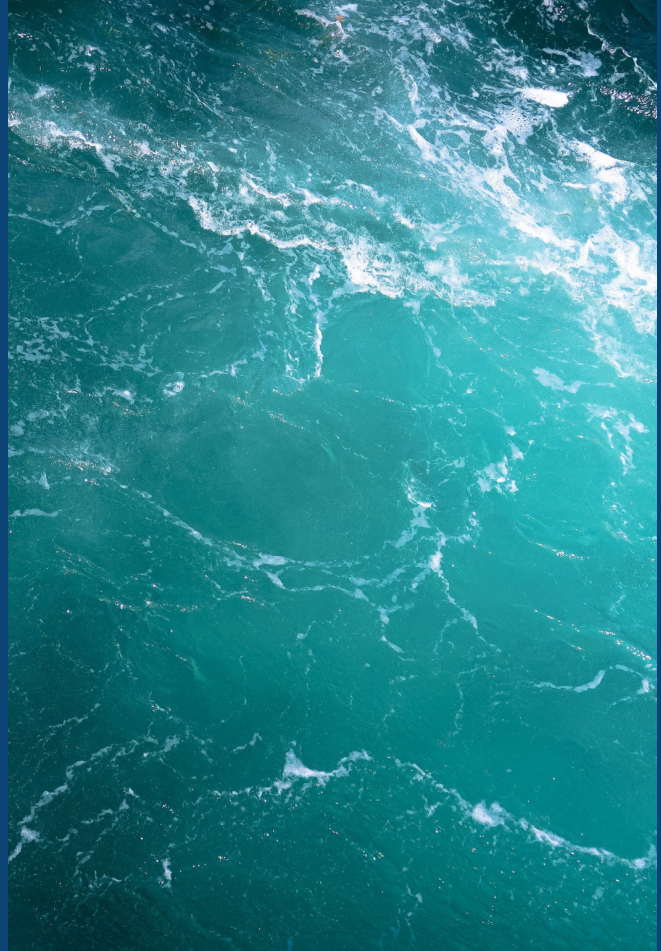
The station put together and implemented a study plan:

- Permits were reviewed for parameters and limits that might be affected by increasing the amount of BRUW utilized during the summer months. A target maximum conductivity below the permit limit was established to prevent the water from exceeding regulated limits during the study.
- The Operations team coordinated with the third-party vendor to develop a test plan.
- The test plan was initiated at the end of June 2023 with adjustments to the conductivity operating limit made within a predetermined range while the vendor monitored the water quality. Increases in calcium and phosphate levels, both constituents of concern that can lead to equipment damage and increased conductivity, were noted.
- The calcium and phosphate concentrations at the top of the operating limit are impacted by concentration cycling in the cooling tower. While increased cycling reduces the amount of makeup water required for cooling, the associated increase in calcium and phosphate concentrations can reduce heat exchanger performance and polymer effectiveness.

Linden Station: Maximizing Beneficial Reuse Water (cont.)

- The study was used to identify an internal conductivity threshold within permit limits that would allow for more cycling and the use of BRUW for makeup, thus reducing the need for expensive city water.
- As the new internal conductivity limit is approached, the operators blow down the tower water and resupply it with BRUW or city water to bring it within the desired range. The third-party vendor continues to monitor the calcium and phosphate concentrations with satisfactory results.
- The increase in the internal conductivity limit has been in effect since July 20, 2023.

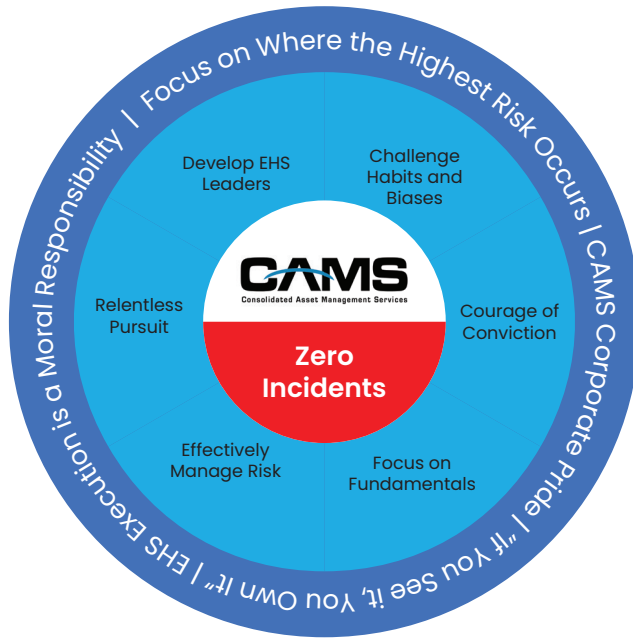
Over the August to September test period, there was a reduction in city water usage. As a result of the increased cycling allowed by the new internal conductivity level, the site used 10 million gallons less total cooling water in August 2023 as compared to August 2022 (potable water + BRUW). However, 86 million gallons less potable water was used in August 2023 than in August 2022. Additionally, savings to procure water from August to September 2023 was \$42K compared to the same period in 2022, scaled to reflect differences in throughput. There would be greater savings realized for the full summer period of May to September.



In conclusion, the site identified an opportunity within its current permits to maximize BRUW usage for both routine operations and high-load summer conditions. Also, the site now better understands the limiting factors for increased BRUW usage as phosphate and calcium in the BRUW supply. These materials, if in excess, will cause additional scaling of the condensers. The result was an incremental improvement in reducing city water usage and boiler blowdown.

EHS Excellence Award Recipients

By Ben Vodila, Vice President, Health & Safety



The Health and Safety of CAMS employees, contractors, customers, and communities is critical to our mission to provide best-in-class service to the energy industry. CAMS is committed to respecting and protecting the environment in daily business operations. One way that CAMS encourages the achievement of world-class results is to recognize employees who exemplify the pillars of the CAMS EHS Vision with the CAMS EHS Excellence Award.

This quarter, in line with our EHS Vision model, Bill Walsh, Conemaugh, Will Ritz, Woodbridge Energy Center, and Trent Simpson, Temple Power, received the EHS Excellence award for consistently spearheading efforts in the Relentless Pursuit of hazard mitigation and for their Focus on Fundamentals, ultimately contributing to the achievement of Zero Safety Incidents at their facilities in 2023.

During the 2023 H&S Compliance Assessment at Conemaugh, Operations Superintendent Bill Walsh stood out as a true EHS Leader. As Bill escorted Corporate H&S Team members throughout the facility, and as potential regulatory compliance violations were noted, Bill directed members of his team to immediately rectify the hazards. His strong commitment to a safe work environment was evident and there were relatively issues requiring further attention by the end of the assessment. For Bill's exemplary EHS Leadership, he was awarded the EHS Excellence Award.

Employees at the Woodbridge Energy Center recommended EHS Compliance Specialist, Will Ritz, for his contributions to the growth of their EHS program. Will's relentless pursuit of perfection vastly improved the control of hazards. He challenged the site personnel's habits and biases by identifying and then ordering specialized PPE to mitigate noise hazards while still allowing the use of plant



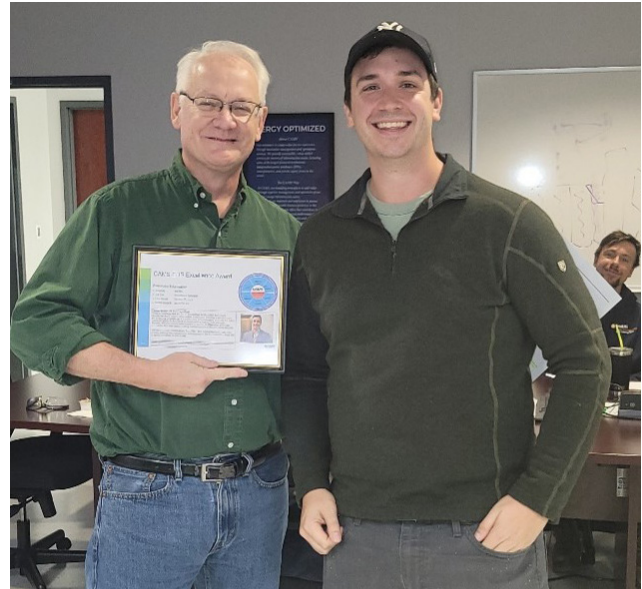
Karl Pflughaupt congratulates Bill Walsh, Conemaugh, Operations Superintendent.

EHS Excellence Award Recipients (cont.)

radios for communication. For Will's proactive EHS Leadership, he was awarded the EHS Excellence Award.

Temple Power joined CAMS at the beginning of 2023 with an exemplary management commitment to safety. Still, the site remains exposed to the EHS challenges typical of power generation facilities. Upon completion of the initial Corporate H&S Compliance Assessment, Plant Manager Trent Simpson committed to promptly mitigating identified hazards and completing the associated action items. Administrative controls were immediately implemented where necessary to protect against hazards, and within 6 months over 95% of all identified actions were closed. For Trent's display of Relentless Pursuit and Effectively Managing Risk, Trent was awarded the EHS Excellence Award.

As CAMS Operations Managers and Corporate EHS members continue to focus on improving our performance in line with the CAMS EHS Vision, we seek nominations of individuals and teams deserving of recognition. If you would like to recognize someone or have any questions or concerns about expectations or the CAMS EHS Vision in general, please contact us at Safety@camstex.com, or contact Vice President of Health & Safety - Ben Vodila (bvodila@camstex.com) or Senior Vice President of Environmental - Derek Furstenwerth (dfurstenwerth@camstex.com).



Chip Bergeron, Plant Manager congratulates Will Ritz, EHS Compliance Specialist, CPV Woodbridge



Temple Power Team, from left to right, Doug Barry (Auxiliary Plant Operator), Trent Simpson (Plant Manager), Scott Smith (Maintenance Manager), Carl Hubnik (Mechanic), Peter Castro (Control Room Operator), Ben Martin (Mechanic), Moody Evans (Scheduler/Planner), Mike Willadsen (Operations Manager), Boots Kirk (Mechanic), Marselino Benites (Shift Supervisor), and Jake DeLisle (Safety).

Year-end Snapshots



Griffith Energy Sponsors Youth Sports

Griffith Energy is an active sponsor of youth soccer teams in Lake Havasu City, Arizona. Pictured to the left is the Griffith Energy – Best in the West – Lake Havasu Lions soccer team.



Merom “Generating Smiles” Campaign

2023 marked the 24th year that Merom Generating Station employees donated gifts to children and families through local charitable organizations. This year the Merom Team provided Christmas gifts to 40 Sullivan County children in foster care.



CPV Three Rivers Energy Center

CAMS staff are active members of the surrounding community, and on behalf of CPV Three Rivers, they are the face of the facility to community organizations. For the second year in a row, CPV Three Rivers Energy Center donated \$5,000 to We Care of Grundy County. We Care of Grundy County was established as a resource for county residents. The donation was used to fund grocery store gift cards to supplement holiday meals to those in need. CPV Three Rivers and We Care of Grundy are both members of the Grundy Chamber of Commerce.

Pictured (from left to right) are Patrick Chmielewski, Maintenance Manager; Jael Waddick, Business Manager; Adam Chapman, Compliance Specialist; Brian Delcorio, Plant Engineer; Michael Korolenko, Operations Manager; Paul Gregor, Plant Manager; and Eric Fisher, Executive Director, We Care of Grundy County.

Year-end Snapshots (cont.)



Raleigh Office Toys for Tots

The Raleigh Office participated in a holiday fundraiser for the Marine Toys for Tots program. This organization provides toys, books, and other gifts to children in need at Christmastime. Approximately \$1,000 was donated, which will be matched by CAMS through our Matching Gift Program.



Corporate Office Blood Drive

In collaboration with the Gulf Coast Regional Blood Center, CAMS hosted a blood drive at the Houston corporate office. Six employees participated, donating 4 units of Whole Blood, 1 Unit of Double Red Cells, and 1 unit of AX-RBC/Plasma.



Corporate Office Support Supports Local Charities

CAMS employees contributed over \$1,400 to the Houston Fire Department Operation Stocking Stuffer Drive and the Friends for Life Food Bank.

The Houston Fire Department Stocking Stuffer Drive benefits underprivileged children within Houston and its surrounding areas. Each year, the organization provides toys for more than 20,000 children.

Friends For Life is Houston's longest-running pet food bank and is entirely donor-funded. Friends for Life provides food for pets so that families in hard times who cannot afford pet food or supplies can avoid having to surrender their pets to a shelter.

Griffith and Hamakua Celebrate Safety Milestones



Griffith Energy Plant Staff Celebrate 20 Year Milestone

The power generation industry involves complex processes and technologies. Each day CAMS employees mitigate numerous hazards including electrical systems, rotating equipment, chemical exposure, heat and cold stress, noise and vibration, and working at heights. Facility employees demonstrate their adherence to our Corporate Vision of Zero Incidents through a relentless focus on safety, teamwork, and effective communication.

The achievement of multiple consecutive years without a single safety incident is a rare and remarkable feat, showcasing dedication, commitment, and successful implementation of rigorous protocols. This year, both the Griffith Energy and Hamakua Energy facilities reached impressive safety record milestones. On May 24, Hamakua achieved 7,000 days without a lost time incident. On November 7, Griffith achieved 20 years and over one million man-hours without a lost time incident. These facilities are an inspiration to the entire CAMS fleet and the power generation industry.



Hamakua Energy Plant Staff Celebrate 7,000 days LTI Free

Changes to Air Reporting Rule

By Jonathan Martensen, Senior Environmental Associate



Substantially all of the thermal power plants CAMS operates or manages are subject to detailed air emissions data reporting requirements and are equipped with Continuous Emissions Monitoring Systems or use similar processes to generate the emissions data. A significant amount of additional emissions data, particularly data on Hazardous Air Pollutants (“HAPs”), are submitted to the United States Environmental Protection Agency (“EPA”) and state agencies in diverse, often inconsistent, formats. EPA is proposing to harmonize many of these requirements under the Air Emissions Reporting Requirements (“AERR”) rule, an existing regulation with limited applicability.

On July 25, 2023, EPA announced proposed revisions to AERR to collect additional HAP data, close reporting gaps, revise reporting requirements for certain mobile and non-traditional air emissions sources, and add reporting requirements for peaking power generation. Reported data would not be confidential. The proposed action would require information on all 188 HAPs from major sources and significant emissions of HAPs from non-major sources to be submitted to EPA for inclusion in the National Emissions Inventory.

The revisions would require performance test and performance evaluation data to be reported to EPA for all tests conducted after the effective date in 2026, with a proposed January 15, 2028 report submission deadline. Some such data are currently reported to EPA electronically, as documented at <https://www.epa.gov/electronic-reporting-air-emissions/cedri#list>. The proposed rule would also expand Toxics Release Inventory reporting requirements to include additional sub-facility details beyond what is currently reported.

Small Generating Units

The proposed rule would require reporting for “small generating units,” (“SGU”) which include:

(continue next page)

Changes to Air Emissions Reporting Rule (cont.)

- Generating units less than 25 MW not already reporting under 40 CFR 75 or the Mercury and Air Toxics Standards (“MATS”); and
- Backup generators (“BUG”) – units run periodically both to offset grid-based energy needs at energy-intensive facilities and to generate electricity for the grid.

The specific data elements that EPA proposes to require SGU to report are as follows:

- Unit rated capacity in hp and kilowatts
- Unit manufacturer and model
- Installation date of the unit
- Source classification code (including the fuel type)
- Identification of each BUG operated in a year
- For each SGU day of operation:
 - Date of activity
 - Fuel used or heat input and associated units of measure
 - Optionally the start hour and end hour of operation.

States would also need to report facility inventory information (e.g., unit characteristics) and daily fuel use or heat input data for small generating units operated on land.

Per- and Polyfluoroalkyl substances (“PFAS”)

EPA is also considering inclusion of PFAS in reporting requirements. PFAS are a class of compounds persistent in the environment that can accumulate in body tissues and have recently been under increased scrutiny as an environmental pollutant. Given the wide range of PFAS compounds, lack of measurement methods for many individual PFAS compounds, and limited toxicity data for most individual PFAS compounds, this section of the proposed AERR seeks comments on the “PFAS Option”. The PFAS Option, if included in the final rule, would set an air emissions reporting threshold at 0.05 tons per year.





BUSINESS ETHICS

Confidential Reporting

CAMS complies with the highest level of governance standards, and we stand by our Code of Ethics and Business Conduct. We believe it is important to allow for suspected violations to our code to be reported anonymously to help us further safeguard our stakeholders' confidence and protect our reputation.

CAMS' CONFIDENTIAL REPORTING PROVIDES THE ABILITY TO REPORT ETHICAL OR OTHER ISSUES THROUGH A THIRD-PARTY VENDOR, ANSWERFIRST, THAT CAN BE ACCESSED BY CALLING 346-500-6288.

Confidential reporting through AnswerFirst complements our current reporting practices, as outlined in the Employee Handbook, which is available for download from Fuse at My Company->Documents.

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