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Texas Ports and Courts Update

November 2021

In this Update:

1. COVID-19 Update

General Statewide Conditions

Statewide new COVID-19 cases and hospitalizations have dropped considerably over the past several weeks. The 7-day average for new daily cases peaked at over 20,000 in mid-September, but, by early-November, the 7-day average dropped to below 4,000 new daily cases.

Additionally, statewide hospitalized COVID-19 patient counts have dropped to ~3,000 by early-November. This is a sharp decrease from the ~10,000-13,000 daily totals observed for most of September.

Texas continues to have plentiful vaccine supplies and various vaccination incentives, and statewide vaccination numbers continue to steadily increase. When we last reported in mid-September, almost 60% of the Texas population aged 12 and over was fully vaccinated and nearly 78% of the Texas population aged 65 and over were fully vaccinated. As of early November, almost 65% of those 12 and over are fully vaccinated and over 81% of those 65 and over are fully vaccinated (additionally, over 90% of the 65 and over population has received at least one vaccine dose). Vaccinations are also now available for children between the ages of 5 and 11.

Texas Port Conditions

We note two recent federal-level COVID-19 response items that are relevant to Texas port operations.

OSHA Vaccine-or-Test Mandate

On November 5, the Occupational Safety and Health Administration (OSHA) published an Emergency Temporary Standard (ETS) that applies to all employers under OSHA's jurisdictional umbrella with more than 100 employees. The ETS requires that, subject to certain exceptions, covered employees either (1) be fully vaccinated against COVID-19; or (2) wear face coverings and submit COVID-19 test results to the employer on a weekly basis. Under the ETS, vaccination and testing compliance enforcement is set to begin on January 4, 2022.

The ETS also mandated that, by December 5, 2021, employers must comply with various other requirements, including (1) establishing, implementing and enforcing a written vaccination policy; (2) determining the vaccination status of each employee; (3) providing paid time off for vaccination and recovery from side effects; (4) ensuring compliance with requirements regarding the reporting of positive tests and removal of those who test positive or are diagnosed with COVID-19 from the workplace; (5) ensuring that unvaccinated employees are masked when indoors and when occupying a vehicle with someone else for work, except in limited circumstances; and (6) reporting work-related COVID-19 fatalities and in-patient hospitalizations.

Various companies and individuals immediately petitioned the Fifth Circuit Court of Appeals (overseeing Texas, Louisiana, and Mississippi) to challenge the vaccine-or-test directive. Generally speaking, the petitioners contend that the vaccine-or-test mandate is unconstitutional and OSHA overstepped its authority.

On November 12 (following issuance of a November 6 emergency stay), a Fifth Circuit 3-judge panel further stayed the ETS pending judicial review and directed OSHA to take no steps to implement or enforce the ETS until further court order. The panel identified multiple reasons why the ETS should be permanently enjoined, including potential constitutional infirmity under the Commerce Clause and non-delegation doctrine.

Even if the ETS is ultimately found to be constitutional, the panel added that COVID-19 was not the proper subject of emergency administrative action by OSHA. First, the panel stated COVID-19 does not pose a grave danger because the virus — which is widely present and not particular to any workplace, and "non-life threatening to a vast majority of employees" — does not arise to such a toxic or physically harmful "substance" or "agent" contemplated by the Occupational Safety and Health Act. In support, the panel highlighted OSHA's prior statements that COVID-19 does not present the type of emergency that permits OSHA to take the extreme step of implementing an emergency temporary standard. Second, with respect to the necessity of the ETS, the panel noted the strained correlation between the ETS's vaccination requirements for employers with over 100 employees and the alleged hazard of COVID-19. Particularly, the panel noted that the ETS was "the rare government pronouncement" that is both overinclusive and underinclusive. The panel observed that the ETS overbroad because it defines covered employers not by the actual threat of COVID-19 transmission posed by a specific workplace or to specific workers, but broadly covers all workplaces based on the number of employees alone. The panel found the ETS to be equally underinclusive in that it fails to protect workers simply because a given employer has a workforce

of less than 100 employees, even though these employees are exposed to the identical alleged "grave danger" posed by exposure to COVID-19.

Because the Fifth Circuit's order bars OSHA from enforcing and/or taking any steps to implement the ETS, the December 6 and January 4 deadlines are presently no longer in effect. However, the order's impact may be short-lived. ETS challenges are pending in nearly all of the federal appellate circuits, and they will be further decided in a consolidated manner before a single appellate circuit. A lottery drawing protocol picks which circuit will hear the numerous challenges in a consolidated manner. On November 16, the lottery was held, and the consolidated proceeding was assigned to the Sixth Circuit based in Cincinnati, Ohio. Although the Sixth Circuit has typically been viewed as a fairly centrist appellate court, recent Trump-era appointees have added several more conservative judges.

Regardless of whether the Fifth Circuit's stay remains in effect, final resolution of the issue whether the ETS was a proper exercise of OSHA's authority is expected to likely involve review by the United States Supreme Court at some point down the road.

Presidential Proclamation Rescinding Travel Bans & Implementing COVID-19 Vaccination Requirements

On October 25, President Biden issued a Presidential Proclamation lifting severe travel restrictions on China, India and much of Europe, and revising various other COVID-19 travel restrictions/guidelines.

Although further technical instructions and clarifications are expected later this month, initial guidance from MARAD and other sources indicates that the proclamation will have some impacts on non-vaccinated mariners joining vessels in U.S. ports. Specifically, non-vaccinated mariners will be permitted to onboard at a U.S. port if: (1) the mariner has a D or C1 visa; (2) a negative COVID-19 test within 24 hours of scheduled airline departure; and (3) the mariner signs an attestation upon arrival in the U.S. that he/she will take another COVID-19 test (PCR preferred) within 3-5 days.

In its Technical Instructions, the CDC has identified three documentation categories considered to be acceptable proof of COVID-19 vaccination:

(1) Verifiable digital or paper records: This includes, but is not limited to, examples such as vaccination certificates or digital passes accessible via QR code (such as the UK NHS COVID Pass and the European Union Digital COVID Certificate).

(2) Non-verifiable paper records: A paper vaccination record or a COVID-19 vaccination certificate issued by a national or subnational level or by an authorized vaccine provide (such as the CDC vaccination card).

(3) Non-verifiable digital records: Digital photos of vaccination card or record, or a downloaded record or vaccination certificate from an official source (e.g., public health agency, government agency, or other authorized vaccine provider), or a record shown on a mobile phone app without a QR code.

The proclamation defers to the CDC's guidance on acceptable vaccines, which include: (1) Janssen/Johnson & Johnson; (2) Pfizer-BioNTech; (3) Moderna; (4) AstraZeneca; (5) Covishield; (6) BIBP/Sinopharm; and (7) Sinovac (available in Asia).

We will continue to keep an eye on these items, as we anticipate that further developments will arise in the coming days/weeks.

Texas Court Conditions

Reynaldo G. Garza - Filemon B. Vela
United States Courthouse, Brownsville

Trials are steadily resuming at many Texas federal and state courts. Over the summer and fall, Royston Rayzor teams have tried a number of cases.

We note that over recent weeks, the Houston federal courts have conducted multiple jury trials, and even the typically quieter Galveston federal court recently conducted two civil trials over a one-week period (a jury trial and a bench trial).

Meanwhile, in Harris County (Houston), a state court civil jury recently awarded $352 million to an injured plaintiff (more on that below).

Given the backlogs from the COVID-19 pandemic and other events preceding the pandemic (e.g., delays/court closures arising from Hurricane Harvey (2017), etc.), we anticipate that trial activity will continue to increase so long as local public health metrics continue to trend in the right direction.

2. Recent Port Activity and Development Projects

Below are some highlights of recent activities and expansion efforts at the Ports of Brownsville, Corpus Christi, Freeport, Galveston, Houston, and Port Arthur/Beaumont.

Brownsville:

The Port Sets Another Rail Cargo Record

The Port of Brownsville, the only deep-water port along the U.S.-Mexico border, set a new record in September when the Brownsville & Rio Grande International Railway handled 6,369 loaded railcars during the month – a 41% increase over September 2020 levels. The diverse rail cargo included wind energy equipment, bulk steel, lumber, and fuel. Based upon current data, rail cargo at the Port of Brownsville is expected to set a new annual record as well.

Corpus Christi:

Phase 3 of Channel Improvement Project

The U.S. Army Corps of Engineers has awarded Great Lakes Dredge & Dock a $139 million contract for Phase 3 of the Port of Corpus Christi's four-phase Channel Improvement Project (CIP). Phase 3 of the CIP will extend the ship channel west of the La Quinta Junction through the

Chemical Turning Basin in the port's Inner Harbor. Completion of Phase 3 is expected by June 2023.

Great Lakes completed Phase 1 of the CIP in March 2020, deepening and widening the waterway from the Gulf of Mexico to Harbor Island. Callan Marine is working on Phase 2, which will expand the channel from Harbor Island to 2.7 miles past the La Quinta Junction. Phase 2 includes Ingleside, which is the home to three large crude export marine terminal operators: Buckeye Partners, Enbridge (Moda Midstream), and Flint Hills Resources.

Once the CIP is completed, the channel's depth will increase from 47 feet to 54 feet. The channel is also being widened to 530 feet, with an additional 400 feet of barge shelves. The port has provided $161.5 million for its portion of the total project cost share, while the U.S. government has appropriated $296.3 million.

LNG Export Growth Continues

Cheniere Energy recently announced a 13-year term agreement to sell liquified natural gas to a Glencore subsidiary. The contract, which is scheduled to begin in April 2023, adds momentum to Cheniere's planned Stage 3 expansion of its Corpus Christi export plant. A final company decision on the Stage 3 expansion is expected next year, and the expansion could include as many as seven midscale liquefaction trains that would boost Corpus Christi facility's total liquefaction production capacity by 10 million tons to a total of 25 million tons per year.

This has been a robust year for LNG exports. With respect to its U.S. facilities, Cheniere recently reported a record 141 liquefied natural gas cargos for Q3 2021, up from 55 cargos the same time last year.

Freeport:

Demand for LPG/LNG Exports Remains Strong

Phillips 66 recently reported that its Freeport LPG export facility loaded 41 cargos in Q3 2021, just one cargo below its previous record set in the prior quarter. Through the first three quarters of 2021, the Phillips 66 facility has loaded 124 cargos.

Although demand for LNG exports continues to be robust, Freeport LNG's 15 million mt/yar facility has hit some recent snags attributable to needed repairs to one of the pre-treatment trains at the facility. The pre-treatment train has been out of service since an unspecified incident that

occurred in late October. Full production is expected to resume in late November.

Galveston:

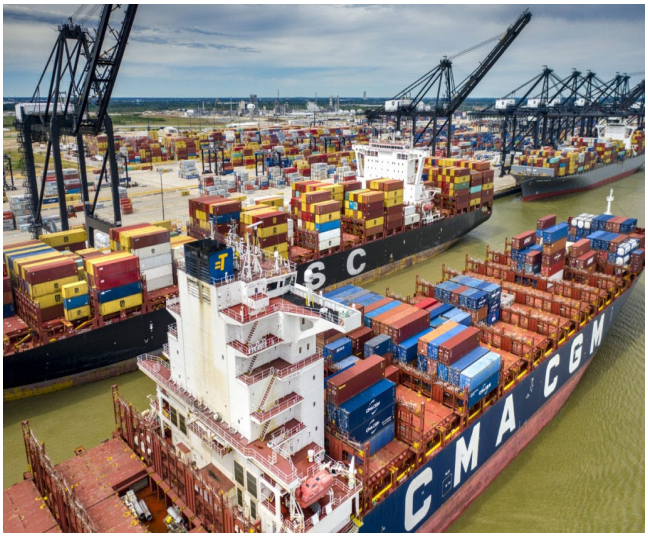
Positive Outlook for Cruise Travel

Over the four-month period since U.S. cruise operations resumed, more than 1,350 passengers have tested positive for COVID-19. The U.S. Centers for Disease Control and Prevention (CDC) reported the figure last month in an order extending its COVID-19 restrictions on U.S.-based cruise ships until at least January 15, 2022.

Although the CDC report did not quantify the total number of people that have boarded cruise ships since U.S. cruise operations resumed, the number of COVID-positive passengers appears to be rather small. In Galveston alone, more than 168,000 cruise passengers departed the port between July and September, and, nationwide, an estimated 600,000 passengers have sailed on cruise ships since U.S. cruise operations resumed in late June 2022.

Carnival and Royal Caribbean have regularly sailed out of Galveston since the resumption of U.S. cruise operations. More vessels, including some larger ones, are joining the rotation calling at Galveston. For instance, Royal Caribbean's 3,100-passenger Adventure of the Seas departed earlier this month on its initial cruise from Galveston. The 2,400-passenger Disney Wonder will begin its holiday-season cruise schedule later this month as well.

Houston:



Container Terminals Continue to Break Records

It has been 65 years since the world's first container ship – the S.S. Ideal X, a converted World War II tanker – made history in 1956 by delivering 58 containers from Newark, New Jersey to Houston. Although Houston has remained an important container port over the ensuing years, the recent supply chain pressures have fueled new record-breaking activities in 2021.

The Port of Houston's container activity for September 2021 was 281,500 twenty-foot equivalent units (TEUs), up 11% compared to the same month last year. This marks the seventh consecutive month for containers to show double-digit growth. Year-to-date, TEUs are up 16% compared to 2020. Not surprisingly, the increase in activities has brought some new strains. For instance, the length of time that a

container sits at the port has recently doubled. Instead of 3-4 days, a container may now sit up to 10 days.

Increased Steel Import Activity

Port of Houston steel imports rose 161% in September 2021 compared to September 2020. Steel imports are up 28% year-to-date, which is reflective of increased activity in the energy industry. The Texas onshore and offshore rig count is up 243 rigs from October 1, 2020 – almost double compared to last year. The recent uptick in the energy sector has fostered a strong demand for steel pipe cargos.

Port Arthur/Beaumont:

Another Example of the Strong NGL Export Market

The Energy Transfer terminal in Nederland continues to report strong natural gas liquids (NGL) export volumes. Energy Transfer's percentage of global natural gas liquids (NGL) exports has doubled over the last 18 months to nearly 20%, or more than any other company or country for Q3 2021. The company expects that total NGL export volumes from the Nederland terminal will continue to increase throughout next year. The Nederland terminal is now the second-largest NGL export facility in the world, with a refrigerated storage capacity of more than 3 million standard barrels of ethane, propane, butane and natural gasoline. The Nederland terminal features six docks, including the first one built in 1901 that recently underwent a new outfitting to load ethane for export.

3. News from the Courts

- *In re Grebe Shipping, LLC,* No. 4:20-cv-1212 (S.D. Tex. Oct. 13, 2021) – granting summary judgment dismissal of multiple claims arising from a fatal cargo collapse incident at the Port of Houston

Background

On March 20, 2018, the M/V Grebe Bulker arrived at a berth at the Port of Houston for the discharge of steel pipe cargo. Discharge operations commenced the following day. On March 27 (the seventh day of discharge operations), a stevedore assisting with cargo discharge operations, Francisco Montoya, was standing on a bundle of pipes in one of the vessel's holds. The bundle of pipes shifted as the vessel's crane was unloading an adjacent bundle of pipes, and Montoya was fatally injured. Six of Montoya's fellow stevedores allegedly suffered personal injuries avoiding the shifting pipe and/or responding to the accident.

OSHA investigated the incident and found that the stevedoring company committed a serious violation when it failed to take necessary precautions to prevent cargo from falling during discharge operations. Nevertheless, Montoya's family and the six other longshoremen (collectively, the "Claimants") brought this suit against the vessel's owners, managers, and charterers (collectively, the "Vessel Interests"), alleging that the failure of the cargo's composite wood dunnage was the cause of the incident.

The Vessel Interests' Summary Judgment Motion and the Claimants' Response

The Vessel Interests filed a summary judgment motion arguing that the Longshore and Harbor Workers' Compensation Act (LHWCA) provided the Claimants' exclusive remedy, and the Claimants failed to show any violation of the three duties owed to stevedores under Section 905(b) of the LHWCA as described by the U.S. Supreme Court in *Scindia Steam Navigation Co. v. De Los Santos*: (1) the turnover duty; (2) the active control duty; and (3) the duty to intervene.

Pointing to the fact that the cargo was stowed with dunnage made of composite wood, the Claimants argued that the Vessel Interests violated the turnover duty by (1) using dangerous and improper composite wood dunnage, and (2) not warning the stevedores of the rough seas that the vessel encountered prior to its arrival in Houston. The Claimants also argued that, even if the hazards were obvious, the "no alternative" exception applied since the Vessel Interests created the hazardous condition.

The Court's Analysis

Under the turnover duty, a vessel owner has two responsibilities: (1) a duty to exercise ordinary care under the circumstances to turn over the vessel and its equipment in such a condition that an expert stevedore can carry on stevedoring operations with reasonable safety; and (2) a duty to warn the stevedore of latent or hidden damages which are known or should have been known to the vessel. However, the duty to warn does not include dangers that (1) are open and obvious; or (2) should be anticipated by a reasonably competent stevedore. The open and obvious defense also applies to the general duty to exercise ordinary care. However, under the "no alternative" exception, if a stevedore's only alternatives when facing an open and obvious hazard are unduly impracticable or time consuming, the vessel owner may still be held liable.

With respect to the Claimants' first argument that the Vessel Interests failed to exercise ordinary care by using innately dangerous composite wood dunnage, the district court observed that, in *Kirksey v. Tonghai Maritime*, the Fifth Circuit concluded that the open and obvious defense applies to claims of improper dunnage. The district court further found that the open and obvious defense should apply, as the stevedoring company's superintendent and walking foreman were both aware of the composite wood dunnage prior to the incident. As noted above, the incident occurred seven days after the start of cargo discharge operations.

As to the Claimants' second argument that the Vessel Interests violated their duty to advise the stevedoring company that the vessel had experienced rough seas, the district court again looked to *Kirksey* for guidance. The stevedoring company in *Kirksey* was aware of allegedly inadequate dunnage prior to the incident, and, as such, the *Kirksey* opinion found that the vessel crew's knowledge of rough seas during transit was immaterial. In the instant case, the district court noted that over a four-day prior to the incident, the stevedoring company's superintendent witnessed broken dunnage in all of the vessel's holds. The superintendent also testified that each morning, and less than an hour before the incident, he warned the longshoremen of the danger that the dunnage could break during discharge operations. Accordingly, the district court found that the

condition of the cargo stow was open and obvious and known by the stevedoring company. Thus, the Claimants' arguments regarding the sea conditions during the vessel's transit were found immaterial.

Finally, with respect to the Claimants' argument that the "no alternative" exception should apply, the district court looked to the OSHA findings that the stevedoring company failed to take adequate precautions to ensure that the remaining cargo in the vessel holds did not fall during the course of discharge operations. The court also noted that post-incident work instructions from the stevedoring company included directions that the stevedores take their time and move away from dangerous situations during cargo lifts. The stevedoring company's safety director also testified that moving away from dangers during cargo lifts would take only about 30 seconds. Viewing all of this information collectively, the district court found that alternative courses of action were available to the stevedoring company and its workers. Accordingly, the "no alternative" exception did not apply.

Because the Claimants failed to raise any fact issues with respect to violation of the turnover duty, the district court granted summary judgment in favor of the Vessel Interests. The district court's order granting summary judgment may be accessed via the following link:

https://www.dropbox.com/s/hm584yv5owf49e5/Grebe%20Shipping%2C%20LLC%20v.%20Medrano%20%28Order%20Granting%20MSJs%29.pdf?dl=0

(*Charterers were represented by David R. Walker and Blake E. Bachtel of our Galveston office*)

- ## The return of jury trials has brought some eye-catching damages awards.

As noted above and in our previous reports, many Texas federal and state courthouses are attempting to resume normal in-person activities, including jury trials. The return of jury trials has produced some recent verdicts with noteworthy damages awards. Two Harris County jury verdicts issued last month are briefly described below.

Cecilia Cruz, et al. v. Allied Aviation Fueling Co., et al., No. 2019-81830, In the 127th District Court of Harris County ($352 million verdict)

Ulysses Cruz was employed as a wing walker for United Airlines at Houston's Bush Intercontinental Airport. As a wing walker, Mr. Cruz's job duties included walking behind a plane's wingtips as the plane was towed in order to check that the plane and its wings were free from obstructions. On the morning of September 7, 2019, Mr. Cruz was walking behind the wingtip of a plane as it was being pushed back from the gate when the plane was struck by an Allied Aviation van driven by Reginald Willis. Mr. Cruz was thrown to the ground and hit the tarmac sustaining serious injuries, including spinal trauma resulting in paraplegia, other serious fractures and injuries to his torso, as well as a brain injury and respiratory trauma. Mr. Cruz's wife and two children filed suit individually and on his behalf against Mr. Willis and his employer, Allied Aviation. The Cruz family alleged that the injuries to Mr. Cruz required round-the-clock medical care for the rest of his life. By April 2021, less than two years following the incident, Mr. Cruz's family alleged that his employer's workers' compensation carrier had already paid over $2.4 million for his care.

The case was tried before a Harris County (Houston) jury in October. The defendants argued that United Airlines and/or Mr. Cruz should be apportioned some responsbility for his alleged negligence in stepping upon a vehicle service road used by Allied Aviation and other aircraft service companies (and thus improperly placing himself in the path of Mr. Willis' oncoming van). Despite the defense's arguments, the jury returned with a verdict that found no fault against United Airlines or Mr. Cruz and apportioned fault solely between Mr. Willis (30%) and Allied Aviation (70%).

Given the nature of Mr. Cruz's injuries, his age (50), and his continuing health needs, a damages award crossing the eight-figure mark would not be unheard of in Harris County. However, the jury went much further, awarding the following damages, including some very large amounts for non-economic damages:

> Mr. Cruz: $34.89 million in economic damages ($2m in past medical care; $30m in future medical care; $290k in past loss of earning capacity; $2.6m in future loss of earning capacity); and **$252.5 million in non-economic damages** ($15m for past physical pain; $15m for past mental anguish; $70m for future physical pain; $70m for future mental anguish; $15m for past physical impairment; $35m for future physical impairment; $10m for past disfigurement; $22.5m for future disfigurement)
>
> Mr. Cruz's wife: $132,000 in economic damages ($32k for loss of past household servies; $100k for loss of future household services); and **$25.15 million in non-economic damages** ($150k for past loss of spousal consortium; $25m for future loss of spousal consortium)
>
> Mr. Cruz's Child #1 (a minor): **$20.05 million in non-economic damages** ($50k for past loss of parental consortium; $20m for future loss of parental consortium)
>
> Mr. Cruz's Child #2 (an adult): **$20.05 million in non-economic damages** ($50k for past loss of parental consortium; $20m for future loss of parental consortium)

The non-economic damages in the *Cruz* verdict ($317.75 million) comprise over 90% of the total $352,772,000 award, and they are more than nine times the value of the economic damages awarded in the case. The Cruz family did not seek punitive damages. Texas' tort reform changes over recent years have made punitive damages a more difficult path, and one way the plaintiff's bar has tried to sidestep these measures is by seeking hefty non-economic damages awards as a substitute. This appears to be an extreme example of such tactics at work. The defendants have indicated they will appeal the verdict.

Jack Cargal, et al. v. FedEx Freight, Inc., et al., No. 2018-80520, In the 334th District Court of Harris County ($30 million verdict)

Joseph Cargal (age 68) was killed in a September 2018 vehicle collision that occurred in East Texas when a FedEx Freight tractor trailer crossed multiple lanes of traffic, including the center median, and hit Mr. Cargal's tractor trailer head-on. Mr. Cargal died at the scene of the accident. Mr. Cargal's widow brought suit individually and on behalf of his estate, and Mr. Cargal's two adult sons also made claims. Mr. Cargal's widow and his estate settled prior to trial. The jury found FedEx (51%) and the FedEX driver (49%) at fault for the collision.

The jury awarded $30 million to Mr. Cargal's two adult sons. Each son was awarded the same damages amounts: $3 million in pecuniary/economic damages ($500k for past pecuniary loss – loss of care, maintenance, support, services, advice, counsel and reasonable contributions of pecuniary value; $2.5m for future pecuniary loss); and $12 million in non-economic damages ($3m for past loss of companionship; $3m for future loss of companionship; $3m for past mental anguish; $3m for future mental anguish).

Given the unusually large quantum of the damages awarded to Mr. Cargal's two adults sons, it comes as no surprise that FedEx has indicated it will challenge the verdict on appeal if necessary.

It remains to be seen if these recent damages awards are isolated aberrations or indications of developing jury trends. We will also keep an eye out for any responsive action in the appellate courts.

- Update: *Servotronics, Inc. v. Rolls-Royce PLC* – The Supreme Court's input on the availability of U.S. court-assisted discovery in relation to foreign arbitrations will have to wait for another day.

  As we reported in our July update, in *Servotronics, Inc. v. Rolls-Royce PLC*, the U.S. Supreme Court was expected to weigh in on the issue of whether 28 U.S.C. § 1782 permits parties to foreign arbitrations the right to use the U.S. federal court system to conduct U.S.-style discovery in aid of foreign arbitration proceedings. Section 1782 allows an applicant to petition a U.S. federal district court to order the disclosure of documents or compel a deposition "for use in a proceeding in a foreign or international tribunal." This is obviously a useful device for parties to an arbitration in a jurisdiction that does not have the same liberal discovery procedures as those available in the U.S. The point of contention with respect to Section 1782 is the fact that the statute does not define "foreign or international tribunal", and this omission has created a split amongst the intermediate federal courts of appeal as to whether the statute applies to international commercial arbitration panels seated in jurisdictions outside the U.S.

  Due to an apparent settlement between the parties, the *Servotronics* matter was dismissed at the end of September. While that individual dispute was dismissed, the issue remains an important question that lower courts continue to face. Thus, it appears likely that Supreme Court will soon have another opportunity to address this issue.

This update was collectively prepared by our offices in Houston, Galveston, Corpus Christi, and Brownsville. Our maritime lawyers and marine investigators are conveniently located near each of Texas' major ports.

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