

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	05/20/2025	
Media Program:	Water (CWA)	
Regulatory Program(s)	NPDES Offshore Program	
Company Name:	W&T Offshore VI, LLC	
Facility Name:	A / Virgo Facility (Permitted Feature 0008)	
Facility Physical Location:	Viosca Knoll 823 at 29.1819°N, -88.1677°W	
(city, state, zip code)	Gulf of America – U.S. Federal Waters	
Mailing address:	5718 Westheimer Rd, Suite 700	
(city, state, zip code)	Houston, TX 77057	
County/Parish:	Orleans Parish	
Facility Phone Number	(713) 624-7338	
Facility Contact:	John C. Poole	Vice President, HSE&R
	jpoole@wtoffshore.com	
Complex ID:	113	
Identification/Permit Number:	GMG290382	
OSC Lease:	G10942	
BSEE Inspection ID No.:	553203928	
Facility Description:	A fixed platform	
Personnel participating in inspection:		
Kerri McCabe (lead)	EPA / Region 6 ECDW	Inspector / Enforcement Officer
Michael Blaha	EPA / Region 6 ECDW	Inspector / Enforcement Officer
Ronald McClary	BSEE / GOA OCS Region	Water Quality Coordinator, Engineer
Eddy Burger	W&T Offshore VI, LLC	Facility Point of Contact
EPA Lead Inspector Signature/Date		
	Kerri McCabe	Date
Supervisor Signature/Date		
	Jeanne Eckhart	Date

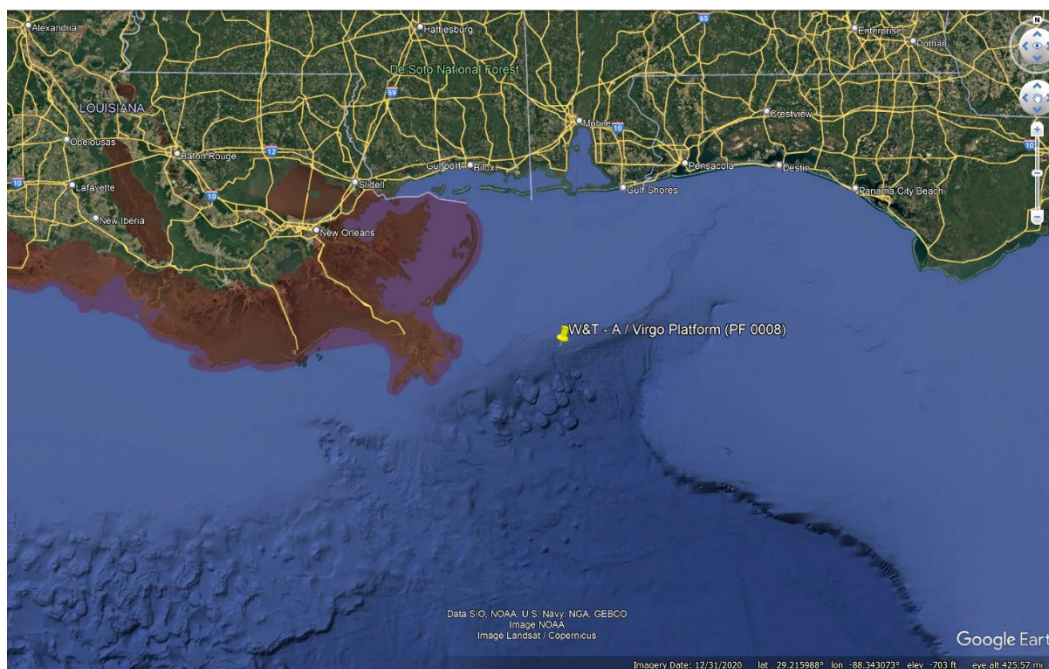
Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

Environmental Protection Agency (EPA) Region 6 inspectors Kerri McCabe (lead) and Michael Blaha and Bureau of Safety and Environmental Enforcement (BSEE) inspector Ronald McClary arrived at the W&T Offshore VI, LLC (“W&T”) – A / Virgo Facility at 11:30 am on 05/20/2025, for an announced Compliance Evaluation Inspection (CEI) of the EPA National Pollutant Discharge Elimination System (NPDES) general permit GMG290000 and the BSEE Pollution Prevention and Control Regulations. After initial facility entry, we met with the facility point of contact (PIC) Eddy Burger. The W&T point of contact is Deepu Dethan at ddethan@wtoffshore.com. All observations recorded for this inspection were stated verbally by the facility personnel in the inspection interview, obtained from the facility written records, or obtained from records submitted to EPA and contained on the data website entitled the Integrated Compliance Information System (ICIS). Background information in support of this report was obtained from the Technical Information Management System (TIMS) database maintained by BSEE and the Bureau of Ocean Energy Management (BOEM) and the United States Coast Guard (USCG) National Response Center (NRC) reporting system reviewed by BSEE daily.

FACILITY DESCRIPTION

The A / Virgo Facility (Complex ID No. 113) is a fixed platform installed in 1999 and operated by W&T Offshore VI, LLC. The facility is located in Viosca Knoll 823 lease block, approximately 50 miles offshore from Louisiana's coast, at an approximate water depth of 1,130 feet. The facility presently supports oil and gas processing equipment, pumping equipment, fuel and chemical storage, and living quarters. This facility processed, on average, approximately 360 BOPD, 285 BWPD, and 5 MMSCF/day. The facility is manned 24/7 and houses approximately 16 personnel during normal operations.



Map 1. Google Earth aerial image dated 12/31/2020 of the W&T Offshore VI, LLC – A / Virgo Facility location.

The EPA general permit number for W&T Offshore VI, LLC is **GMG290382** and the Discharge Monitoring Report (DMR) Permitted Feature ID number for this platform is **0008**, with the facility name “A / Virgo.” W&T submits DMR to EPA for the following Limit Set Designators:

A / Virgo Facility (Permitted Feature 0008):

- Maintenance Best Management Plan (BMP) (BM)
- Chemically Treated Waters (CT)
- Deck Drainage (DD)
- Domestic Waste (DW)
- Miscellaneous Discharges (Includes Packer Fluids & Pipeline Brine) (MD)
- Produced Water Monthly Toxicity (PM)
- Produced Water (PR)
- Sanitary Waste (SW)

There is no requirement for a CW (cooling water intake) Limit Set Designator reporting to EPA due to the age of the facility. The CW limit set applies if the facility was constructed after July 17, 2006.

Section II – SUMMARY OF BSEE INSPECTION

The inspection consisted of:

- An interview of personnel about their work practices and procedures,
- A records review of facility data and observation logs,
- A review of the reporting history to EPA for facility discharge data and values based on the facility raw data records and the certified values reported on official DMRs to EPA,
- An observation of any in-house, on-site procedures, and methodology,
- A review of facility plans and documentation,
- A review of the facility’s Uniform Waste Manifests for removal of materials and solids from the facility for proper disposal,
- A review of the facility spill and release history from NRC reports,
- A review of BSEE environmental enforcement actions,
- A facility tour and review of general housekeeping practices, with an emphasis on viewing containment and treatment systems utilized, including the facility’s Marine Sanitation Device (MSD; see Photos No. 1 through No. 3), floatation cell (see Photos No. 4 through No. 6), and deck sump (see Photos No. 8 and No. 9). EPA and BSEE also discussed and observed W&T personnel collect a produced water oil and grease sample (see Photo No. 7).

Section III – AREAS OF CONCERN

During this inspection, BSEE observed the following inspection findings related to the environmental compliance of this facility:

- 1.) Inspection findings for “Onsite Records for Produced Water Discharges” are as follows:
 - W&T had incomplete Chains of Custody [COC; Part I, Section B, Note 2 (40 CFR 136)],
 - Most oil and grease samples reviewed for the focus period (07/01/2023-02/28/2025) were received by the lab with a pH value greater than 2 standard units (s.u.). [Part I, Section B, Note 2 (40 CFR 136)],

- The November 2024 lab report notates that the COC was not received with the sample; the lab received COC later from the facility [Part I, Section B, Note 1 (40 CFR 136)],
- The records maintained by the operator are not consistent in the way that produced water discharges are reported. The operator is reporting either “no sheen” or “no discharge” as documentation of monitoring. If there is no discharge, there is no sheen to report. “No sheen” should be used during produced water discharges to document the presence/absence of sheen events (Part I, Sec. B, 4, b, Visual Sheen),
- Multiple DMR produced water monthly averages are incorrect (Part II, Section D, 4), and
- The facility failed to analyze produced water temperatures for multiple months (Part I, Section B, 4, b).

2.) Inspection finding for “Sandblasting and Maintenance Plan” is as follows:

- The BMP Plan will need the 5-year review/revision at the end of 2025 (Part II, Section B, 2, c, 2, Best Management Practices, d).

3.) Inspection findings for “Operator Competency in Sample Collection and Preservation Requirements” are as follows:

- Facility personnel are unfamiliar with sheen sampling protocols, and the facility did not have any sheen sampling bottles onsite (Part I, Section B, 4, b; Part II, Sec. B, 3, a),
- Facility personnel analyze the temperature of the produced water samples by placing the thermometer directly in the lab sample [Part I, Section B, Note 1 (40 CFR 136)], and
- The facility does not use custody seals on the produced water samples submitted to the lab [Part I, Section B, Note 1 (40 CFR 136)].

Section IV – LIST OF APPENDICES

Appendix 1 – Photograph Log – 9 photos taken 05/20/2025.

The official inspection report, completed by BSEE, has been sent to the U.S. EPA Region 6. Once received, the assigned enforcement officer will evaluate the report for any compliance issues and determine if an enforcement action is necessary.

Appendix 1

Photograph Log 9 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: A / Virgo platform in Viosca Knoll 823 at 29.1819°N, -88.1677°W		
City: New Orleans	County/Parish: Orleans Parish	State: Louisiana (GOA)



Photo File Name: 100-0977

Orientation: 266° W

Date of Photo: 05/20/2025

Time of Photo: 1151

Latitude: 29.181733

Longitude: -88.167583

Photographer: Kerri McCabe

Description: Looking W, this photo shows the manufacture's plate for the Marine Sanitation Device (MSD). Note: this is not the same as the USGS plate.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: A / Virgo platform in Viosca Knoll 823 at 29.1819°N, -88.1677°W		
City: New Orleans	County/Parish: Orleans Parish	State: Louisiana (GOA)



Photo File Name: 100-0978

Orientation: 280° W

Date of Photo: 05/20/2025

Time of Photo: 1151

Latitude: 29.181733

Longitude: -88.167550

Photographer: Kerri McCabe

Description: Looking W, this photo shows an overview of the Type II MSD.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: A / Virgo platform in Viosca Knoll 823 at 29.1819°N, -88.1677°W		
City: New Orleans	County/Parish: Orleans Parish	State: Louisiana (GOA)



Photo File Name: 100-0979

Orientation: 357° N

Date of Photo: 05/20/2025

Time of Photo: 1152

Latitude: 29.181718

Longitude: -88.167565

Photographer: Kerri McCabe

Description: Looking N, this photo shows the tablet chlorinator for the MSD; chlorine tablets are present.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: A / Virgo platform in Viosca Knoll 823 at 29.1819°N, -88.1677°W		
City: New Orleans	County/Parish: Orleans Parish	State: Louisiana (GOA)



Photo File Name: 100-0980

Orientation: 51° NE

Date of Photo: 05/20/2025

Time of Photo: 1156

Latitude: 29.182267

Longitude: -88.167467

Photographer: Kerri McCabe

Description: Looking NE, this photo shows the floatation cell used to separate fine oil droplets from produced water at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: A / Virgo platform in Viosca Knoll 823 at 29.1819°N, -88.1677°W		
City: New Orleans	County/Parish: Orleans Parish	State: Louisiana (GOA)



Photo File Name: 100-0982

Orientation: 336° NNW

Date of Photo: 05/20/2025

Time of Photo: 1156

Latitude: 29.182300

Longitude: -88.167350

Photographer: Kerri McCabe

Description: Looking NNW, this photo shows an additional view of the floatation cell at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: A / Virgo platform in Viosca Knoll 823 at 29.1819°N, -88.1677°W		
City: New Orleans	County/Parish: Orleans Parish	State: Louisiana (GOA)



Photo File Name: 100-0983

Orientation: 219° SW

Date of Photo: 05/20/2025

Time of Photo: 1157

Latitude: 29.182366

Longitude: -88.167383

Photographer: Kerri McCabe

Description: Looking SW, this photo shows an additional view of the floatation cell at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: A / Virgo platform in Viosca Knoll 823 at 29.1819°N, -88.1677°W		
City: New Orleans	County/Parish: Orleans Parish	State: Louisiana (GOA)

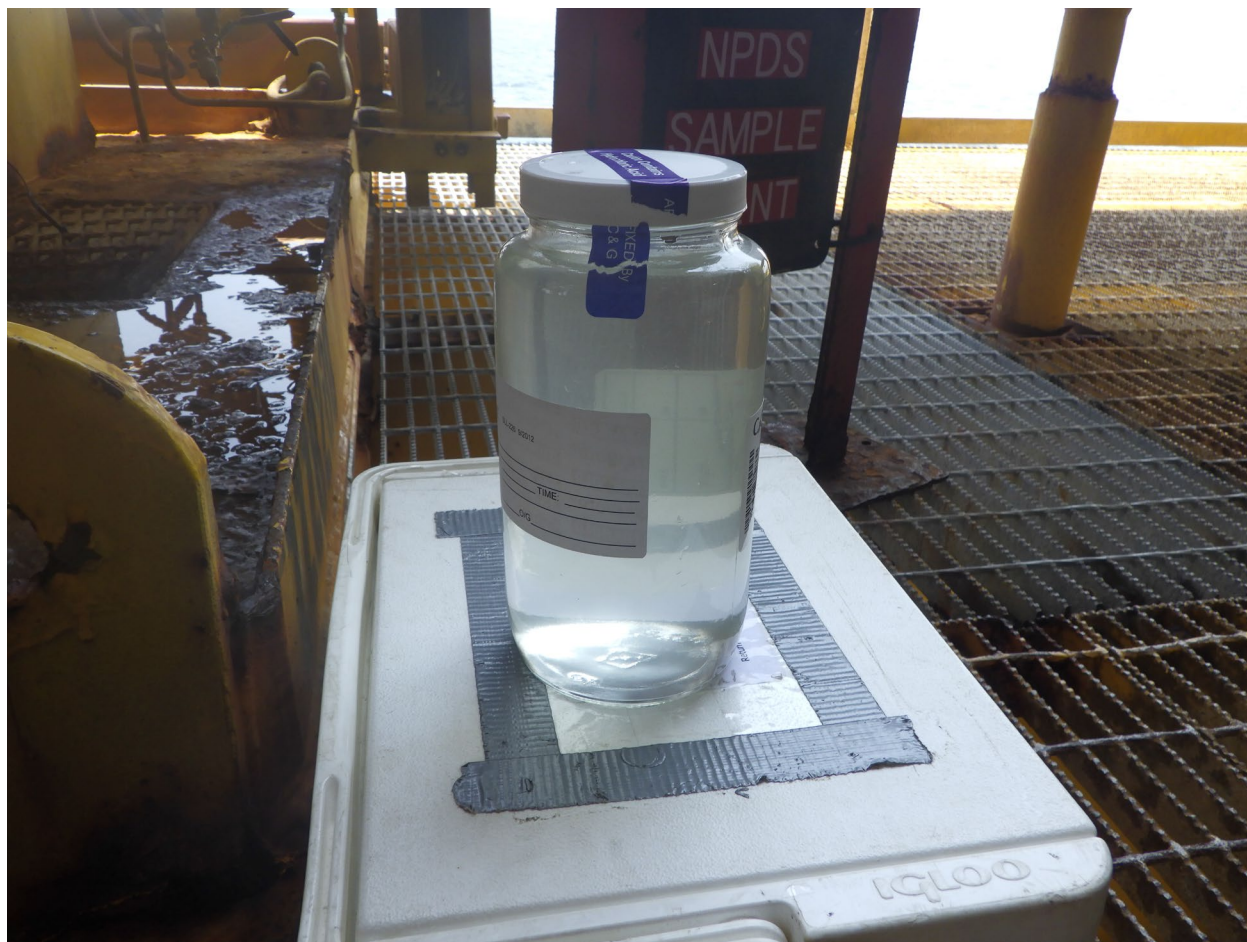


Photo File Name: 100-0984

Orientation: 101° ESE

Date of Photo: 05/20/2025

Time of Photo: 1202

Latitude: 29.182150

Longitude: -88.167250

Photographer: Kerri McCabe

Description: Looking ESE, this photo shows a produced water sample taken from the floatation cell for the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: A / Virgo platform in Viosca Knoll 823 at 29.1819°N, -88.1677°W		
City: New Orleans	County/Parish: Orleans Parish	State: Louisiana (GOA)



Photo File Name: 100-0985

Orientation: 176° S

Date of Photo: 05/20/2025

Time of Photo: 1208

Latitude: 29.181750

Longitude: -88.167833

Photographer: Kerri McCabe

Description: Looking S, this photo shows the deck sump for the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: A / Virgo platform in Viosca Knoll 823 at 29.1819°N, -88.1677°W		
City: New Orleans	County/Parish: Orleans Parish	State: Louisiana (GOA)



Photo File Name: 100-0987

Orientation: 179° S

Date of Photo: 05/20/2025

Time of Photo: 1208

Latitude: 29.181750

Longitude: -88.167818

Photographer: Kerri McCabe

Description: Looking S, this photo shows the secondary containment and drainpipe for the deck sump.