



REGION 6
DALLAS, TX 75270

July 30, 2025

TRANSMITTED VIA EMAIL

Blair Spencer
HSE Manager
Cantium, LLC
111 Park Place Drive, Suite 100
Covington, LA 70433
blair.spencer@cantium.us

Re: Notice of Potential Violation and Opportunity to Confer
NPDES Permit: GMG290615

Dear Mr. Spencer:

Information currently available to the United States Environmental Protection Agency, Region 6 (EPA) suggests that Cantium, LLC (Cantium) may have committed violations of Section 301 of the Clean Water Act (CWA), 33 U.S.C. § 1311 and National Pollution Discharge Elimination System (NPDES) General Permit for Offshore Activities (GMG290000) at the Permitted Features listed in the Enclosures. By this letter, EPA is extending to you an opportunity to advise EPA, via a conference call or in writing, of any information which EPA should consider with respect to the potential violations.

Cantium owns or operates facilities that discharge pollutants to the waters of the contiguous zone or the ocean under the permit, GMG290615. EPA identified the potential violations in a file review for the monitoring period of May 11, 2023 to May 31, 2025 and in a compliance evaluation inspection conducted by the United States Bureau of Safety and Environmental Enforcement (BSEE) on June 24, 2024. The potential violations are listed in Attachments contained herein. **Within 15 calendar days of receipt of this letter**, please indicate if you would like to discuss this matter by contacting Uma Lad of my staff at (214) 665-8563 or Lad.Uma@epa.gov.

Sincerely,


Bryant Smalley
Chief
Water Enforcement Branch

Enclosures

Attachment A – DMR Non-Receipt Violations

Attachment B – BSEE Inspection Violations

ec: Judy Triche, Chief, Environmental Monitoring Unit, BSEE
judy.triche@bsee.gov

Attachment A
Environmental Protection Agency
Integrated Compliance Information System (ICIS)
DMR Non-Receipt Violations
GMG290615

Review Period: 05/11/2023 - 05/31/2025

Monitoring Period End Date	Monitoring Period	Limit Set	Lease Area/Block¹	Parameter	NODI Code²	DMR Due Date	DMR Submission Date
07/31/2023	From 07/01/2023 to 09/30/2023	0009-PR	BM-3	00010 - Temperature, water degree centigrade	**E**	11/30/2023	11/30/2023

¹ BM = Bay Marchand

² Information on DMR Non-Receipt status can be found on here: [NPDES DMR Non-Receipt Status Search Help](#).

ATTACHMENT B
BSEE Inspection Report Violations
GMG290615
Permitted Features 0058, 0063, 0064

Inspection Date: 06/24/2024
BSEE Inspection ID: 492490736
Records Review Period: 05/01/2022 – 04/30/2024
Lease Area/Block: Main Pass 42

Limit Set	Description of Violations	Violation Date(s)	Permit Citation
CT	The operator is incorrectly submitting miscellaneous discharges under miscellaneous discharges (chemically treated) in DMR.	06/24/2024	Part II, Sec. D, 4
DC	There was no Best Management Practice (BMP) Plan onsite.	06/24/2024	Part II, Section B, 2, c, 2, Best Management Practices, b
PW	Multiple chains of custody (COC) for produced water samples were incomplete.	05/01/2022 – 04/30/2024	Part II, Sec. C, 4, a-g
PR	The lab received monthly produced water samples that were not properly sealed.	05/01/2022 – 04/30/2024	Part I, Sec. B, Note 1-2
PR	Temperature analyses for produced water were not reported on DMR.	05/01/2022 – 04/30/2024	Part II, Sec. D, 4
PR	The operator is not reporting the highest estimated monthly flow rate for produced water discharges.	05/01/2022 – 04/30/2024	Part I, Sec. B, 4, b; Part II, Sec. D, 4
PR	Custody seals for produced water samples are reused.	06/24/2024	Part I, Sec. B, Note 1-2
PR	Sample custody seals were not signed at time of produced water sampling as witnessed during the inspection.	06/24/2024	Part I, Sec. B, Note 1-2
PR	The COC was not filled out at the time BSEE and EPA were onsite to witness personnel collect a produced water oil and grease sample.	06/24/2024	Part I, Sec. B, Note 1-2
SW	The Marine Sanitation Device (MSD) bypass line cannot be easily chlorinated.	06/24/2024	Part II, Sec B, 3, a
	The site map for the NOI is incorrect.	06/24/2024	Part I, Sec A, 2 (facility map)
	There was no thermometer in the sample storage area.	06/24/2024	Part I, Sec. B, Note 1-2