



REGION 6

DALLAS, TX 75270

March 18, 2024

Richard Watson
Vice President, Operations
Torrent Oil, LLC
1415 Louisiana Street, Ste 3550
Houston, Texas 77002

Sent via email: rwatson@talcopetro.com

Re: Notice of Violation and Opportunity to Confer

Dear Mr. Watson:

The United States Environmental Protection Agency, Region 6 ("EPA") has identified Torrent Oil, LLC ("Torrent") as having violated the Clean Air Act ("CAA"). This Notice of Violation and Opportunity to Confer ("NOVOC") is issued to Torrent¹ for violations of the CAA, 42 U.S.C. § 7401 *et seq.*, at the energy extraction facility listed in the Enclosure (the "Facility"). EPA alleges violations of the CAA and the conditions of Texas's federally approved SIP as incorporated into the Texas State Permits as listed in the Enclosure. By this letter, EPA is extending to you an opportunity to advise the Agency, via a conference call or in writing, of any further information EPA should consider with respect to the violations.

This NOVOC is issued pursuant to Section 113(a)(1) of the CAA, 42 U.S.C. § 7413(a)(1), which requires the Administrator of the EPA to notify any person in violation of a SIP or permit, and this NOVOC serves as such notice. The authority to issue this NOVOC has been delegated to the Director of the Enforcement and Compliance Assurance Division, EPA Region 6.

EPA contracted helicopter flyovers in Texas on November 7 and November 8, 2023, to assess emission sources using Optical Gas Imaging ("OGI") technology. On December 1, 2023, EPA sent a letter informing Torrent of potentially unauthorized emissions from a facility that EPA believed was owned/operated by Torrent, along with OGI video captures for the facility. EPA asked Torrent to verify ownership, provide current site-specific permit information, and take any necessary corrective action

¹ Please be advised that some companies may qualify as a "small business" under the Small Business Regulatory Enforcement and Fairness Act ("SBREFA"). The U.S. Small Business Administration has established a Table of Small Business Size Standards, which can be found at: <https://www.sba.gov/document/support-table-size-standards>. The SBREFA Information Sheet provides information on compliance assistance to entities that may qualify as small businesses as well as to inform them of their right to comment to the SBREFA Ombudsman concerning EPA enforcement activities. The SBREFA Information Sheet can be found at: <https://www.epa.gov/compliance/small-business-resources-information-sheet>.

to address unauthorized hydrocarbon emissions. EPA considered information provided by Torrent to determine whether violations occurred at the Facility.

CAA Violations

We are sending this NOVOC to inform Torrent of the following violations at the Facility:

Texas SIP Violations

1. Failure to comply with general requirements located at 30 Tex. Admin. Code §§ 106.4(c), 106.6(b) and (c); and
2. Unlit or improperly operated flare in violation of specific requirements under 30 Tex. Admin. Code §§ 106.352(l)(1), 106.492(1)(B).

Please review the specific violations and information we have provided in the Enclosure regarding each of the facilities at issue.

Opportunity to Confer

This NOVOC provides you with the opportunity to confer with EPA. We request Torrent contact LeeAnne Sharlow, Assistant Regional Counsel, at Sharlow.LeeAnne@epa.gov or (214) 665-7405, within ten (10) business days to discuss this pending matter.

Sincerely,

Cheryl T. Seager, Director
Enforcement and
Compliance Assurance Division

Enclosure

ec: Michael De La Cruz, TCEQ (michael.delacruz@tceq.texas.gov)
Michael Miller, TCEQ (michael.miller@tceq.texas.gov)

Enclosure
Torrent Oil

Site Identity	LAT	LONG	TCEQ Regulated Entity No.	Permit Date	Permit Type	Flyover Date	Flyover Video ID	EPA Team Observations of Flyover Video Capture
Bessie Heights Production Facility	30.045602	-93.92026	RN106509508	10/25/2023	PBR 108573	11/7/2023, 11/8/2023	Pin085_F1.mp4, Pin085_F2.mp4	Unlit flare