



REGION 6

DALLAS, TX 75270

September 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: Administrative Order, Docket Number: CWA-06-2025-1792
NPDES Permit: GMG290615

Dear Mr. Spencer:

Enclosed is an Administrative Order (AO) issued to Cantium, LLC (Cantium) by the United States Environmental Protection Agency (EPA) Region 6 for violations of the Clean Water Act (CWA), 33 U.S.C. § 1251 *et seq.*, and its National Pollutant Discharge Elimination System (NPDES) General Permit for Offshore Activities (GMG290000) under permit number GMG290615. The AO requires Cantium to comply with the provisions set forth in the attached AO for violations identified during 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. EPA requests that you immediately confirm receipt of this e-mail and the attached order by a response e-mail to lad.uma@epa.gov.

The AO does not assess a monetary penalty; however, it does require compliance with applicable federal regulations. The compliance deadline is within thirty (30) calendar days of receipt of the AO. EPA is committed to ensuring compliance with the requirements of the NPDES program, and my staff will assist you in any way possible. Please reference AO Docket Number CWA-06-2025-1792 and NPDES Permit Number GMG290615 in your response.

If you have questions, please contact Uma Lad of my staff at lad.uma@epa.gov or 214-665-8563.

Sincerely,

Cheryl T. Seager, Director
Enforcement and
Compliance Assurance Division

Enclosures

Attachment A – DMR Non-Receipt Violations

Attachment B – BSEE Inspection Violations

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

**UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 6**

IN THE MATTER OF	§	DOCKET NO. CWA-06-2025-1792
	§	
Cantium, LLC	§	
Respondent	§	ADMINISTRATIVE COMPLIANCE ORDER
	§	
	§	
Facility NPDES Permit No.	§	
GMG290615	§	

ADMINISTRATIVE COMPLIANCE ORDER

STATUTORY AUTHORITY

The following findings are made, and Order issued, under the authority vested in the Administrator of the United States Environmental Protection Agency (EPA) by Section 309(a) of the Clean Water Act (the Act), 33 U.S.C. § 1319(a). The Administrator of EPA delegated the authority to issue this Order to the Regional Administrator of EPA Region 6, who further delegated this authority to the Director of the Enforcement and Compliance Assurance Division.

FINDINGS

1. Cantium, LLC (Respondent) is a “person,” as that term is defined at Section 502(5) of the Act, 33 U.S.C. § 1362(5), and 40 C.F.R. § 122.2.
2. At all times relevant to this Order (all relevant times), Respondent owned or operated offshore oil and gas production and/or exploration facilities located in the Central and Western Portions of the Gulf of America in the Outer Continental Shelf (facilities), and is, therefore, an “owner or operator” within the meaning of 40 C.F.R. § 122.2.
3. At all relevant times, the facilities acted as “point sources” of “discharges” of “pollutants” to the waters of the “contiguous zone” or the “ocean” in the Gulf of America within the meaning of Section 502 of the Act, 33 U.S.C. § 1362, and 40 C.F.R. § 122.2.
4. Because Respondent owns or operates facilities that act as point sources of discharges of pollutants to the waters of the contiguous zone or the ocean, Respondent and the facilities are subject to the Act and the National Pollutant Discharge Elimination System (NPDES) program.
5. Under Section 301 of the Act, 33 U.S.C. § 1311, it is unlawful for any person to discharge any pollutant from a point source to the waters of the contiguous zone or the ocean, except with the authorization of, and in compliance with, an NPDES permit issued pursuant to Section 402 of the Act, 33 U.S.C. § 1342.
6. Section 402(a) of the Act, 33 U.S.C. § 1342(a), provides that the Administrator of EPA may issue permits under the NPDES program for the discharge of pollutants from point sources to the waters of

the contiguous zone or the ocean. Any such discharge is subject to the specific terms and conditions prescribed in the applicable permit.

7. Pursuant to Section 402(a) of the Act, 33 U.S.C. § 1342(a), EPA issued the National Pollutant Discharge Elimination System (NPDES) General Permit for Offshore Activities (GMG290000) (permit), which was reissued and took effect in its current form on May 11, 2023. The permit authorizes discharges from new sources, existing sources, and new dischargers in the Offshore Subcategory of the Oil and Gas Extraction Point Source Category (40 C.F.R. Part 435, Subpart A) by operators of lease blocks located in Federal Waters of the Central and Western Portions of the Gulf of America. The permit does not authorize discharges from facilities located in, or discharging to, the territorial seas of Louisiana or Texas or from facilities defined as “coastal,” “onshore,” or “stripper” (40 C.F.R. Part 435, Subparts C, D, and F). The permit is available at:

https://www.epa.gov/system/files/documents/2025-07/2024-gmg290000-minor-mod-final-permit-dated-and-signed_508.pdf.

8. 40 C.F.R. Part 136 sets sampling requirements for oil and grease, including the required containers, preservation techniques, and holding times

9. Part I.A.2 of the permit requires Respondent to submit a facility map that delineates authorized discharge locations and type as an attachment when filing an electronic Notice of Intent (eNOI).

10. Part I.B of the permit requires Respondent to sample and test its effluent and monitor compliance with permit conditions according to specific procedures in order to determine the facilities’ compliance or noncompliance with the permit and applicable regulations, and places certain limitations on the quality and quantity of effluent discharges by Respondent. Effluent limitations, prohibitions, and monitoring requirements are listed in Table 1 of Appendix F of the permit.

11. Part II.B.3 of the permit requires Respondent to properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by permittee as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants and will achieve compliance with the conditions of this permit. Proper operation and maintenance include adequate laboratory controls and appropriate quality assurance procedures. Part II.B.3 also requires Respondent to provide adequate operating staff which is duly qualified to carry out operation, maintenance and testing functions required to ensure compliance with the conditions of this permit.

12. Part II.C.4.a-g of the permit specifies the records of monitoring information that the Respondent must maintain.

13. Part II.D of the permit requires Respondent to file with EPA certified Discharge Monitoring Reports (DMRs) of the results of monitoring, and Noncompliance Reports when appropriate.

14. Part II.D.4 of the permit requires Respondent to submit accurate monitoring results for all facilities for which it has permit coverage.

15. 40 C.F.R. Part 136 sets sampling requirements for oil and grease, including the required containers, preservation techniques, and holding times.

16. EPA conducted a DMR file review for the monitoring period of May 11, 2023, to May 31, 2025.
17. A DMR non-receipt violation based on reporting requirements under Part II.D.4 of the permit occurred at the permitted feature and limit set for monitoring period specified in Attachment A, which is incorporated herein by reference. The DMR non-receipt violation is for failing to conduct sampling or required analyses.
18. The United States Bureau of Safety and Environmental Enforcement (BSEE) conducted a compliance evaluation inspection on June 24, 2024, at Permitted Features 0058, 0063, 0064 located in Main Pass 42 approximately 9 miles offshore from Louisiana's coast, at an approximate water depth of 35 feet. EPA identified the following permit violations from the inspection, which are specified in Attachment B:
- a. The site map provided in the eNOI was incorrect.
 - b. Respondent incorrectly reported miscellaneous discharges under miscellaneous discharges (chemically treated) in DMRs;
 - c. BSEE inspectors observed the following improper sampling methods and quality assurance practices during the inspection and in a review of the records:
 - a. Personnel reused sample custody seals;
 - b. Personnel did not sign custody seals at the time of the produced water sampling event during the inspection;
 - c. Personnel did not fill out the chain of custody (COC) at the time of the sampling event during the inspection;
 - d. There was no thermometer in the sample storage area during the inspection;
 - e. The lab received improperly sealed produced water samples; and
 - f. Multiple produced water samples had incomplete COCs.

The improper sampling methods and quality assurance were violations of 40 C.F.R. Part 136 and Part II.B.3 of the permit.

19. Each instance in which Respondent discharged pollutants to the waters of the contiguous zone or the ocean in amounts exceeding the effluent limitations contained in the permit is a violation of the permit and Section 301 of the Act, 33 U.S.C. § 1311.
20. Each violation of the permit conditions or regulations described above is a violation of Section 301 of the Act, 33 U.S.C. § 1311.

SECTION 309(a)(3) COMPLIANCE ORDER

21. Based on the foregoing Findings and pursuant to the authority of Section 309(a)(3) of the Act, 33 U.S.C. § 1319(a)(3), EPA hereby orders Respondent to take the following actions:
- A. Within thirty (30) days of the effective date of this Order, Respondent shall take measures as necessary to comply with the conditions of the permit and address the violations in Attachments A and B.
 - B. Within thirty (30) days of the effective date of this Order, Respondent shall provide written certification to EPA that the violations cited herein have been corrected and the facilities are

compliant with the requirements of the permit. The written certification must be signed by a responsible corporate officer for Respondent and state the following:

I certify under penalty of law that the violations cited in the EPA Administrative Compliance Order, Docket Number CWA-06-2025-1792, have been corrected and that the Cantium LLC's facilities are compliant with the requirements of the NPDES General Permit GMG290000. Based upon my personal knowledge or personal inquiry of the person or persons directly responsible for gathering the information to make this statement, this statement is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

C. Within thirty (30) days of the effective date of this Order, Respondent shall provide EPA with a corrective action list of all mechanical, management, and operational deficiencies and a narrative describing the specific actions taken to correct all violations cited in this Order. This list shall address the root cause of the deficiencies. Respondent shall provide EPA any costs incurred for corrective actions taken to come into compliance and any associated costs of labor.

D. Within thirty (30) days of the effective date of this Order, Respondent shall submit to EPA plans to prevent future recurrence of the violations in Attachments A and B.

E. Within thirty (30) days of the effective date of this Order, Respondent shall submit a report to EPA that includes the information required in 21.A. through 21.D.

F. In the event Respondent believes complete correction of the violations cited herein is not possible within thirty (30) days of the effective date of this Order, Respondent shall submit a comprehensive written plan for the elimination of the cited violations within the shortest possible time. Such plan shall describe in detail the specific corrective actions to be taken and why such actions are sufficient to correct the violations. The plan shall include a detailed schedule for the elimination of the violations within the shortest possible time, as well as measures to prevent similar violations from reoccurring. Any approved compliance schedule will be incorporated and reissued in a future administrative order.

G. Any information or correspondence submitted by Respondent to EPA under this Order shall be emailed to the following:

Ms. Uma Lad
lad.uma@epa.gov
Enforcement Officer

GENERAL PROVISIONS

Respondent may seek federal judicial review of the Order pursuant to Chapter 7 of the Administrative Procedure Act, 5 U.S.C. §§ 701–706.

Issuance of this Section 309(a)(3) Compliance Order shall not be deemed an election by EPA to waive any administrative, judicial, civil, or criminal action to seek penalties, fines, or any other relief under the Act for the violations cited herein, or other violations that become known to EPA. EPA reserves the right to seek any remedy available under the law that it deems appropriate.

Failure to comply with this Section 309(a)(3) Compliance Order or the Act can result in further administrative action, or a civil judicial action initiated by the United States Department of Justice.

For purposes of the identification requirement in Section 162(f)(2)(A)(ii) of the Internal Revenue Code, 26 U.S.C. § 162(f)(2)(A)(ii), and 26 C.F.R. § 1.162-21(b)(2), performance of Paragraph 21 of the Section 309(a)(3) Compliance Order Section of this Order is restitution, remediation, or required to come into compliance with the law.

This Order does not constitute a waiver or modification of the terms or conditions of Respondent's NPDES permit which remain in full force and effect.

Compliance with the terms and conditions of this Order does not relieve Respondent of its obligations to comply with any applicable federal, state, or local law or regulation.

The effective date of this Order is the date it is received by Respondent.

Cheryl T. Seager, Director
Enforcement and
Compliance Assurance Division

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 Code	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

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
	The site map provided in the NOI was incorrect.	06/24/2024	Part I.A.2 (facility map)
MD/CT	Respondent incorrectly submitted certain miscellaneous discharges under miscellaneous discharges (chemically treated) in DMRs.	06/24/2024	Part II.D.4
PR	Multiple produced water samples had incomplete COCs.	05/01/2022 – 04/30/2024	Part II.C.4.a-g
PR	Personnel reused sample custody seals.	06/24/2024	Part I.B. Note 1-2 40 CFR Part 136
	Personnel did not sign custody seals at the time of the produced water oil and grease sampling event during the inspection.		
	Personnel did not fill out the chain of custody (COC) at the time of the sampling event during the inspection.		
	There was no thermometer in the sample storage area during the inspection.		
	The lab received improperly sealed produced water samples.	05/01/2022 – 04/30/2024	