

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	08/09/2024	
Media Program:	Water (CWA)	
Regulatory Program(s)	NPDES Offshore Program	
Company Name:	W & T Energy VI, LLC	
Facility Name:	A / Matterhorn Platform (Permitted Feature 0005)	
Facility Physical Location:	Mississippi Canyon 243 A at 28.7423 degrees N, 88.8254 degrees W	
(city, state, zip code)	Gulf of Mexico – U.S. Federal Waters	
Mailing address:	5718 Westheimer Rd, Suite 700	
(city, state, zip code)	Houston, TX 77057	
County/Parish:	Harris County	
Facility Phone Number	(713) 624-7338	
Facility Contact:	Steve Hamm	VP HSE & R
	shamm@wtoffshore.com	
Complex ID:	1088	
Identification/Permit Number:	GMG290382	
OSC Lease:	G19931	
BSEE Inspection ID No.:	508808543	
Facility Description:	A Mini Tension Leg platform	
Personnel participating in inspection:		
Kerri McCabe	EPA / Region 6 ECDW	Inspector / Enforcement Officer
Mitty Garcia (lead)	EPA / Region 6 ECDW	Offshore Coordinator
Ronald McClary	BSEE / Gulf of Mexico OCS Region	Water Quality Coordinator, Engineer
Kimberly Ward	BSEE / Gulf of Mexico OCS Region	Water Quality Coordinator, Engineer
EPA Lead Inspector Signature/Date		
	Kerri McCabe	Date
Supervisor Signature/Date		
	Jeanne Eckhart	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

USEPA Region 6 inspectors Mitty Garcia (lead) and Kerri McCabe and Bureau of Safety and Environmental Enforcement (BSEE) inspectors Ronald McClary and Kimberly Ward arrived at the W & T Offshore, LLC (W & T) - Matterhorn Platform A facility at 9:05am on August 9, 2024, for an unannounced Compliance Evaluation Inspection (CEI) of the EPA NPDES general permit GMG290382 and the BSEE Pollution Prevention and Control Regulations. After initial facility entry, we met with the facility operator Shannon Whitaker. W & T contact is Shannon Whitaker at swhitaker3@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 USEPA and contained on their data website entitled the Integrated Compliance Information System (ICIS). Background information in support of this report was also obtained from the Technical Information Management System (TIMS) database maintained by BSEE and BOEM and the USCG National Response Center (NRC) reporting system reviewed by BSEE daily.

FACILITY DESCRIPTION

MC 243 Matterhorn Platform A Facility (Complex ID No. 1088) is a Mini Tension Leg platform installed in 2003 operated by W & T Offshore, LLC. The facility is located in Mississippi Canyon 243, approximately 30 miles offshore from Louisiana's coast, at an approximate water depth of 2,850 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 400 BOPD, 800 BWPD, and 195 SCF/day of gas. The facility is manned 24/7 and houses approximately 27 personnel during normal operations.

The EPA general permit number for W & T Energy VI, LLC is **GMG290382** and the Discharge Monitoring Report (DMR) Permitted Feature ID number for this platform is **0005**. EPA assigned the DMR Limit Set Name for this facility as A Facility. For reporting, EPA has assigned DMR Limit Set Designators as follows:

A / Matterhorn Platform (Permitted Feature 0005):

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

There is a no requirement for a CW (cooling water intake) Limit Set Designator reporting to EPA due to the age of the facility.

Section II – SUMMARY OF INSPECTION

The inspection consisted of:

- An interview of personnel as to their work practices and procedures,
- A thorough 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,
- A partial 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 testing result reports, chain-of-custody forms and sampling procedures,
- A review of the facility spill and release history from NRC reports,
- A review of BSEE environmental enforcement actions, and
- A partial facility tour and review of general housekeeping practices, with a special emphasis on viewing containment and any treatment systems utilized.

Section III – OBSERVATIONS

During this inspection, there were observed areas of potential concern related to the environmental compliance of this facility:

- June 2024 monthly oil and grease sample result missing from the NPDES Discharge Monitoring Report,
- Multiple potential bypass lines were present with many having connectors located near or directly below connection valves in pipes and some leading directly into deck drains,
- Facility's produced water treatment system was offline at the time of inspection and was using a temporary CETCO activated carbon treatment system,
- Confusion amongst the operators regarding the sampling requirements and the responsible party for sampling the temporary CETCO wastewater treatment unit, and
- Facility personnel were not familiar with NPDES general permit requirements for sampling methods and locations.

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