

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:	KNOC Eagle Ford Corporation	
Facility Name:	B / Simba Facility (Permitted Feature 0002)	
Facility Physical Location:	Mississippi Canyon 21 at 28.9373°N, -88.912°W	
(city, state, zip code)	Gulf of America – U.S. Federal Waters	
Mailing address:	5599 San Felipe Street, Suite 725	
(city, state, zip code)	Houston, TX 77384	
County/Parish:	Orleans Parish	
Facility Phone Number	(936) 828-6567	
Facility Contact:	Karen Vanacor	Regulatory and Environmental Manager
	kvanacor@ankorenergy.com	
Complex ID:	1482	
Identification/Permit Number:	GMG29062T	
OSC Lease:	G28351	
BSEE Inspection ID No.:	553203957	
Facility Description:	A tension leg 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
Josh French	KNOC Eagle Ford Corporation	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 KNOC Eagle Ford Corp. ("KNOC") – B / Simba Facility at 9:30 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), Josh French. The KNOC point of contact is Karen Vanacor at kvanacor@ankorenergy.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 B / Simba Facility (Complex ID No. 1482) is a tension leg platform installed in 2005 and operated by KNOC. The facility is located in Mississippi Canyon 21 lease block, approximately 30 miles offshore from Louisiana's coast, at an approximate water depth of 667 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 1,390 BOPD, 3,500 BWPD, and 889 SCF/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 KNOE Eagle Ford Corp. – B / Simba Facility location.

The EPA general permit number for KNOC is **GMG29062T** and the Discharge Monitoring Report (DMR) Permitted Feature ID number for this platform is **0002**, with the facility name “B / Simba.” KNOC submits DMR to EPA for the following Limit Set Designators:

B / Simba Facility (Permitted Feature 0002):

- BMP (Maintenance Best Management Plan)
- CT (Chemically Treated Waters)
- DD (Deck Drainage)
- DW (Domestic Waste)
- HF (Hydrate Control Fluids)
- MD (Miscellaneous Discharges – Includes Packer Fluids & Pipeline Brine)
- MT (Miscellaneous Discharges – Chemically Treated)
- PM (Produced Water Monthly Toxicity)
- PR (Produced Water)
- SW (Sanitary Waste)
- Well Treatment Fluids, Completion Fluids, Workover Fluids (TC)
- Well Fluids (WF)

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. 4 through No. 6) and floatation cell (see Photos No. 1 through No. 3). EPA and BSEE also discussed and observed KNOC personnel collect produced water oil and grease sample (see Photos No. 7 through No. 9).

Section III – AREAS OF CONCERN

During this inspection, BSEE observed the following “Facility Inspection Observations” related to the environmental compliance of this facility:

1.) Inspection findings for “Conditions and Performance of Pollution Prevention and Control Systems and Methods” are as follows:

- The MSD did not have a legible USCG certification plate (Part I, Sec. B, 7, Exception),
- Deck drainage sheens were observed on 9/11/2023, 9/13/2023, and 2/21/2025 (Part I, Sec. B, 3, a Free Oil)*, and
- Facility had an uncontrolled bypass line for produced water treatment (Part II, Sec. B, 3, a)*.

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

- The operator did not describe or demonstrate the correct procedures used for sheen sample protocol (Part II, Sec. B, 3, b),
- The operator did not use proper custody seals for samples (Part I, Sec. B, Note 1-2; 40 CFR 136), and
- Incomplete chains of custody (COC; Part I, Sec. B, Note 1-2, 40 CFR 136).

Section IV – LIST OF APPENDICES

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

*Requested clarification from BSEE on 07/03/2025

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: B / Simba Facility (PF 0002) platform in Mississippi Canyon 21 at 28.9373°N, -88.912°W.		
City: New Orleans	County/Parish: New Orleans	State: Louisiana (GoA)



Photo File Name: 100-0966

Orientation: N

Date of Photo: 05/20/2025

Time of Photo: 0951

Latitude: 28.937800

Longitude: -88.911917

Photographer: Kerri McCabe

Description: Looking N, this photo shows an overview of the flotation cell for the facility used to treat produced water. Note: metadata did not transfer from satellite system.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: B / Simba Facility (PF 0002) platform in Mississippi Canyon 21 at 28.9373°N, -88.912°W.		
City: New Orleans	County/Parish: New Orleans	State: Louisiana (GoA)

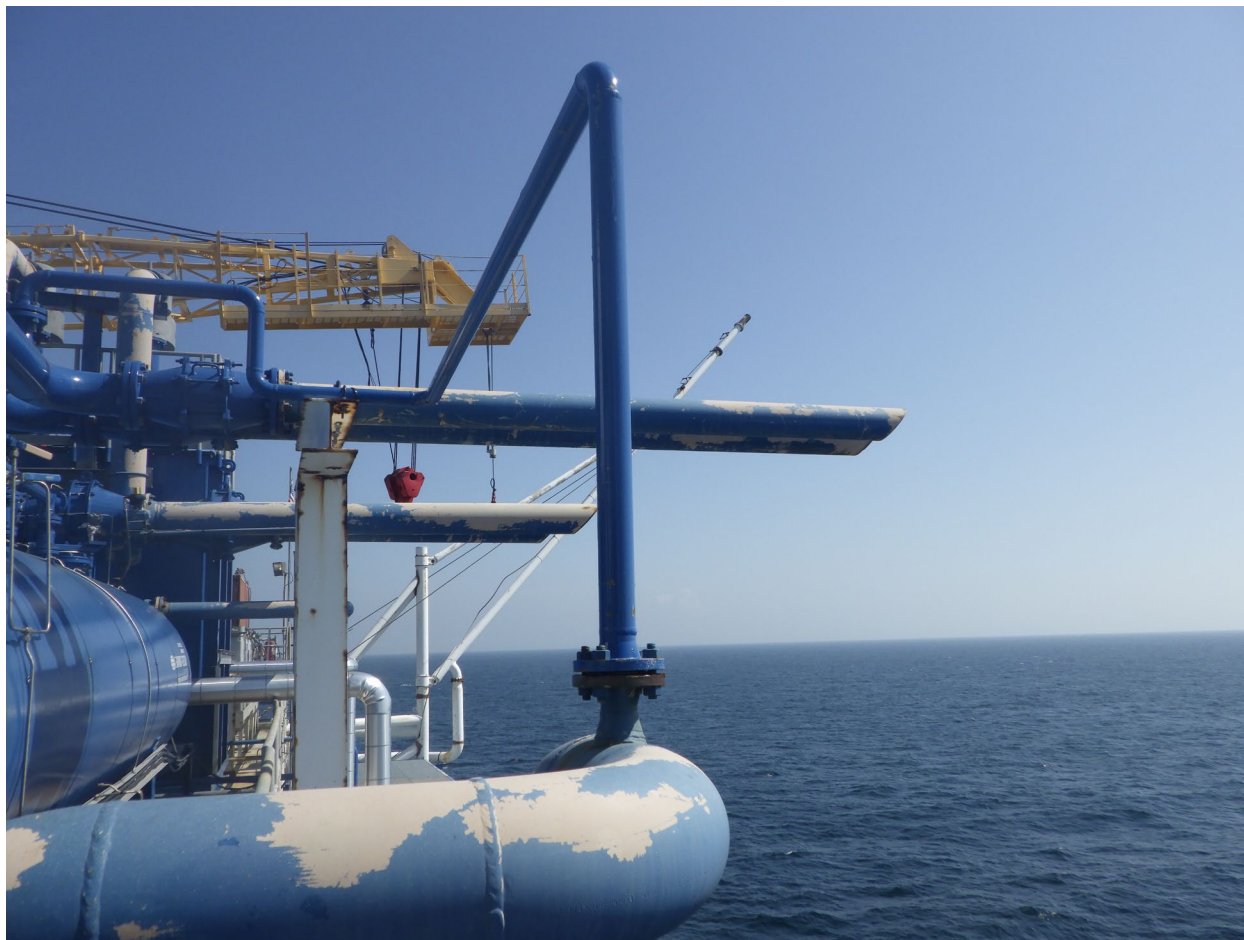


Photo File Name: 100-0968

Orientation: NE

Date of Photo: 05/20/2025

Time of Photo: 0951

Latitude: 28.937800

Longitude: -88.911917

Photographer: Kerri McCabe

Description: Looking NE, this photo shows relief pipes at the flotation cell in case of emergency. Note: metadata did not transfer from satellite system.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: B / Simba Facility (PF 0002) platform in Mississippi Canyon 21 at 28.9373°N, -88.912°W.		
City: New Orleans	County/Parish: New Orleans	State: Louisiana (GoA)



Photo File Name: 100-0970

Orientation: 229° SW

Date of Photo: 05/20/2025

Time of Photo: 0952

Latitude: 28.937800

Longitude: -88.911917

Photographer: Kerri McCabe

Description: Looking SW, this photo shows an additional view of the flotation cell used to treat produced water at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: B / Simba Facility (PF 0002) platform in Mississippi Canyon 21 at 28.9373°N, -88.912°W.		
City: New Orleans	County/Parish: New Orleans	State: Louisiana (GoA)



Photo File Name: 100-0971

Orientation: 305° NW

Date of Photo: 05/20/2025

Time of Photo: 1000

Latitude: 28.937467

Longitude: -88.912917

Photographer: Kerri McCabe

Description: Looking NW, this photo shows the marine sanitation device (MSD) utilized at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: B / Simba Facility (PF 0002) platform in Mississippi Canyon 21 at 28.9373°N, -88.912°W.		
City: New Orleans	County/Parish: New Orleans	State: Louisiana (GoA)



Photo File Name: 100-0972

Orientation: 356° N

Date of Photo: 05/20/2025

Time of Photo: 1001

Latitude: 28.937467

Longitude: -88.912917

Photographer: Kerri McCabe

Description: Looking N, this photo shows the manufacture's plate for the MSD used at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: B / Simba Facility (PF 0002) platform in Mississippi Canyon 21 at 28.9373°N, -88.912°W.		
City: New Orleans	County/Parish: New Orleans	State: Louisiana (GoA)



Photo File Name: 100-0973

Orientation: 344° NNW

Date of Photo: 05/20/2025

Time of Photo: 1001

Latitude: 28.937467

Longitude: -88.912917

Photographer: Kerri McCabe

Description: Looking NNW, this photo shows chlorine tablets inside the chlorinator for the MSD for the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: B / Simba Facility (PF 0002) platform in Mississippi Canyon 21 at 28.9373°N, -88.912°W.		
City: New Orleans	County/Parish: New Orleans	State: Louisiana (GoA)



Photo File Name: 100-0974

Orientation: NE

Date of Photo: 05/20/2025

Time of Photo: 1015

Latitude: 28.937467

Longitude: -88.911950

Photographer: Kerri McCabe

Description: Looking NE, this photo shows the produced water sample kit supplied by the contract lab and the port used to collect the produced water sample from the flotation cell. Note: metadata did not transfer from satellite system.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: B / Simba Facility (PF 0002) platform in Mississippi Canyon 21 at 28.9373°N, -88.912°W.		
City: New Orleans	County/Parish: New Orleans	State: Louisiana (GoA)



Photo File Name: 100-0975

Orientation: 45° NE

Date of Photo: 05/20/2025

Time of Photo: 1016

Latitude: 28.937467

Longitude: -88.911950

Photographer: Kerri McCabe

Description: Looking NE, this photo shows a produced water sample collected by the operator from the flotation cell that is used as monitoring (Oil & Grease Method 5520 C; not approved for reporting purposes).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: B / Simba Facility (PF 0002) platform in Mississippi Canyon 21 at 28.9373°N, -88.912°W.		
City: New Orleans	County/Parish: New Orleans	State: Louisiana (GoA)



Photo File Name: 100-0976

Orientation: 59° ENE

Date of Photo: 05/20/2025

Time of Photo: 1017

Latitude: 28.937467

Longitude: -88.911950

Photographer: Kerri McCabe

Description: Looking ENE, this photo shows the produced water sample with custody label that was collected from the flotation cell for the facility; sample to be analyzed by approved method (Oil & Grease Method(s) 5520 B or 5520 G-2021; 5520 B or 5520 G-2021 and 5520 F-2021).