



REGION 6

DALLAS, TX 75270

July 29, 2025

TRANSMITTED VIA EMAIL

Amanda Saijis, SEMS Coordinator
Walter Oil & Gas Corporation
1100 Louisiana, Suite 200
Houston, Texas 77002
asaijas@walteroil.com

Re: Notice of Potential Violation and Opportunity to Confer
NPDES Permit: GMG290129

Dear Ms. Saijas:

Information currently available to the United States Environmental Protection Agency, Region 6 (EPA) suggests that Walter Oil & Gas Corporation (Walter) 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.

Walter owns or operates facilities that discharge pollutants to the waters of the contiguous zone or the ocean under the permit, GMG290129. 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 September 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 Michael Blaha of my staff at (214) 665-8574 or blaha.michael@epa.gov.

Sincerely,

Bryant Smalley
Chief

Water Enforcement Branch

Enclosures

Attachment A – Effluent Violations

Attachment B – DMR Non-Receipt Violations

Attachment C – 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)
Effluent Violations
GMG290129

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

Monitoring Period End Date	Monitoring Period	Limit Set	Lease Area/Block ¹	Parameter	Value Type/ Stat. Base	Reported Value/Units	Limit Value/Units
02/28/2025	From 01/01/2025 to 03/31/2025	0127-DD	ST, SA-311	82597 - Deck drainage, free oil	C3 MO TOTAL	1 day	0 days
09/30/2024	From 07/01/2024 to 09/30/2024	0322-PR	GI, SA-115	51954 - Oil & grease, free oil	C3 DAILY MX	106.7 mg/l	≤42 mg/L
09/30/2024	From 07/01/2024 to 09/30/2024	0322-PR	GI, SA-115	82599 - Produced water, oil and grease	C2 MO AVG	100.8 mg/l	≤29 mg/L
09/30/2024	From 07/01/2024 to 09/30/2024	0322-PR	GI, SA-115	82599 - Produced water, oil and grease	C3 DAILY MX	281.7 mg/l	≤42 mg/L
06/30/2024	From 04/01/2024 to 06/30/2024	0127-DD	ST, SA-311	82597 - Deck drainage, free oil	C3 MO TOTAL	1 day	0 days
03/31/2024	From 01/01/2024 to 03/31/2024	0087-PR	ST-127	82599 - Produced water, oil and grease	C3 DAILY MX	58.1 mg/l	≤42 mg/L
01/31/2024	From 01/01/2024 to 03/31/2024	0364-DD	EB-165	82597 - Deck drainage, free oil	C3 MO TOTAL	2 days	0 days
10/31/2023	From 10/01/2023 to 12/31/2023	0087-PR	ST-127	51954 - Oil & grease, free oil	C3 DAILY MX	69 mg/l	≤42 mg/L
10/31/2023	From 10/01/2023 to 12/31/2023	0087-PR	ST-127	82599 - Produced water, oil and grease	C2 MO AVG	69 mg/l	≤42 mg/L
07/31/2023	From 07/01/2023 to 09/30/2023	0322-DD	GI, SA-115	82597 - Deck drainage, free oil	C3 MO TOTAL	1 day	0 days

¹ ST, SA = South Timbalier, South Addition; GI, SA = Grand Isle, South Addition; ST = South Timbalier; EB = East Breaks

Attachment B
Environmental Protection Agency
Integrated Compliance Information System (ICIS)
DMR Non-Receipt Violations
GMG290269

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

Monitoring Period End Date	Monitoring Period	Limit Set	Lease Area/Block ²	Parameter	NODI Code ³	DMR Due Date	DMR Submission Date
12/31/2023	From 10/01/2023 to 12/31/2023	0012-PR	SS, SA-243	51954 - Oil & grease, free oil	**E**	02/29/2024	02/29/2024
12/31/2023	From 10/01/2023 to 12/31/2023	0012-PR	SS, SA-243	82599 - Produced water, oil and grease (Daily Maximum)	**E**	02/29/2024	02/29/2024
12/31/2023	From 10/01/2023 to 12/31/2023	0012-PR	SS, SA-243	82599 - Produced water, oil and grease (Monthly Average)	**E**	02/29/2024	02/29/2024
12/31/2023	From 10/01/2023 to 12/31/2023	0364-PM	EB-165	51712 - Whole Effluent Toxicity [WET] - M. beryllina	**E**	02/29/2024	02/29/2024
				51713 - Whole Effluent Toxicity [WET] - Americamysis bahia (formerly Mysidopsis bahia)			
				51726 - Critical Dilution			
				51726 - Critical Dilution			
				TOP3E - NOEC Lethal Static Renewal 7 Day Chronic Americamysis bahia (formerly Mysidopsis bahia)			
				TOP6J - NOEC Lethal Static Renewal 7 Day Chronic Menidia beryllina			
				TPP3E - NOEC Sub-Lethal Static Renewal 7 Day Chronic Americamysis bahia (formerly Mysidopsis bahia)			

² SS, SA – Ship Shoal, South Addition; EB = East Breaks

³ Information on DMR Non-Receipt status can be found on here: [NPDES DMR Non-Receipt Status Search Help](#).

				TPP6J - NOEC Sub-Lethal Static Renewal 7 Day Chronic Menidia beryllina			
				TXP3E - LOEC Lethal Survival Static Renewal 7 Day Chronic Americamysis bahia (formerly Mysidopsis bahia)			
				TXP6J - LOEC Lethal Survival Static Renewal 7 Day Chronic Menidia beryllina			
				TYP3E - LOEC Sub-Lethal Reproduction Static Renewal 7 Day Chronic Americamysis bahia (Mysidopsis bahia)			
				TYP6J - LOEC Sub-Lethal Growth Static Renewal 7 Day Chronic Menidia beryllina			
11/30/2023	From 10/01/2023 to 12/31/2023	0012-PR	SS, SA-243	51954 - Oil & grease, free oil	**E**	02/29/2024	02/29/2024
11/30/2023	From 10/01/2023 to 12/31/2023	0012-PR	SS, SA-243	82599 - Produced water, oil and grease (Daily Maximum)	**E**	02/29/2024	02/29/2024
11/30/2023	From 10/01/2023 to 12/31/2023	0012-PR	SS, SA-243	82599 - Produced water, oil and grease (Monthly Average)	**E**	02/29/2024	02/29/2024

ATTACHMENT C
BSEE Inspection Report Violations
GMG290129
Permitted Feature 0322

Inspection Date: 09/24/2024
BSEE Inspection ID: 524190481
Records Review Period: 8/1/2022-7/31/2024
Lease Area/Block: Grand Isle 115

PF/Limit Set	Description of Violations	Violation Date(s)	Permit Citation
0322-DC	The Best Management Practices (BMP) Plan was dated August 2016; the review or revision of the BMP Plan is due in 2025.	09/24/2024	Part II, Section B, 2, c, 2, Best Management Practices, d
0322-DW	BSEE and EPA Inspectors observed foam from the domestic waste discharge location during the inspection.	09/24/2024	Part I, Sec. B, 9, a
0322-PR	Multiple chains of custody (COC) for produced water oil and grease samples were incomplete.	09/24/2024	Part II, Sec. C, 4, a-g
0322-PR	Sample custody seals were reused for produced water oil and grease samples.	09/24/2024	Part I, Sec. B, Note 1-2
0322-PR	For the March 2024, oil and grease sample for produced water, the date is different for the lab analysis report (3/1) and the DMR (3/5).	March 2024	Part II, Sec. D, 4
0322-PR	Facility personnel analyze the temperature of the produced water oil and grease sample by placing the thermometer directly in the lab sample.	09/24/2024	Part I, Sec. B, Note 1-2
0322-PR	The August 2024 produced water oil and grease sample was not properly preserved (pH > 2 standard units).	August 2024	Part I, Sec. B, Note 1-2
0322-PR	During the inspection, BSEE and EPA Inspectors observed a sheen from a produced water discharge location that was not observed by facility personnel.	09/24/2024	Part I, Sec. B, 4, b, Visual Sheen
0322-PR	Facility personnel are unfamiliar with produced water oil and grease sampling protocols for sheen events.	09/24/2024	Part I, Section B, 4, b
0322	There was no thermometer in the sample storage area.	09/24/2024	Part I, Sec. B, Note 1-2