



REGION 6

DALLAS, TX 75270

July 8, 2025

TRANSMITTED VIA EMAIL

John Poole, VP HSE&R
W & T Energy VI, LLC
5718 Westheimer Rd, Suite 700
Houston, Texas 77057
jpoole@wtoffshore.com

Re: Notice of Potential Violation and Opportunity to Confer
NPDES Permit: GMG290382

Dear Mr. Poole:

The United States Environmental Protection Agency, Region 6 (EPA) finds that W & T Energy VI, LLC (W&T) has potentially 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 the Agency, via a conference call or in writing, of any information which EPA should consider with respect to the potential violations.

W&T owns or operates facilities that discharge pollutants to a water of the United States under the permit, GMG290382. EPA identified the potential violations in a file review for the monitoring period of May 11, 2023 to May 31, 2025 and in compliance evaluation inspections conducted by the United States Bureau of Safety and Environmental Enforcement (BSEE) on August 9, 2024 and May 20, 2025. **Within 15 days of receipt of this letter**, please indicate if you would like to discuss this matter by contacting Kerri McCabe of my staff at (214) 665-6467 or mccabe.kerri@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 – PF0005

Attachment D – BSEE Inspection Violations – PF0008

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

Attachment A
Environmental Protection Agency
Integrated Compliance Information System (ICIS)
Effluent Violations
GMG290382

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

Monitoring Period End Date	Monitoring Period	Limit Set	Lease Area/Block ¹	Parameter	Mon. Loc.	Value Type/ Stat. Base	Reported Value/Units	Limit Value/Units
03/31/2025	From 01/01/2025 to 03/31/2025	0005-DD	MC-243	82597 - Deck drainage, free oil	1	C3 MO TOTAL	1 day	<= 0 days
11/30/2024	From 10/01/2024 to 12/31/2024	0005-DD	MC-243	82597 - Deck drainage, free oil	1	C3 MO TOTAL	1 day	<= 0 days

¹ MC = Mississippi Canyon

Attachment B
Environmental Protection Agency
Integrated Compliance Information System (ICIS)
DMR Non-Receipt Violations
GMG290382

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

Monitoring Period End Date	Monitoring Period	Limit Set	Lease Area/Block ²	Parameter	NODI Code	DMR Due Date	DMR Submission Date
04/30/2024	From 04/01/2024 to 06/30/2024	0008-PR	VK-823	00010 - Temperature, water degree centigrade	**E**	08/31/2024	08/27/2024
04/30/2024	From 04/01/2024 to 06/30/2024	0008-PR	VK-823	82599 - Produced water, oil and grease	**E**	08/31/2024	08/27/2024
04/30/2024	From 04/01/2024 to 06/30/2024	0008-PR	VK-823	82599 - Produced water, oil and grease	**E**	08/31/2024	08/27/2024
11/30/2023	From 10/01/2023 to 12/31/2023	0008-SW	VK-823	82605 - Sanitary waste, residual chlorine	**E**	02/29/2024	02/29/2024

² VK = Viosca Knoll

ATTACHMENT C
BSEE Inspection Report Violations
GMG290382
Permitted Feature 0005

Inspection Date: 08/09/2024
BSEE Inspection ID: 508808543
Records Review Period: 7/1/2022-6/30/2024
Lease Area/Block: Mississippi Canyon 243

PF/Limit Set	Description of Violations	Violation Date(s)	Permit Citation
0005-DD	Multiple potential bypass lines leading to deck drains.	08/09/2024	Part II, Sec. B, 3, a
0005 - PW	Multiple incomplete chains of custody (COC) for produced water samples.	7/1/2022-6/30/2024	Part II, Sec. C, 4, a-g
0005 - PW	June 2024 oil & grease sample results for produced water were not reported on the Discharge Monitoring Report (DMR).	06/2024	Part I, Sec. B, 4, b; Part II, Sec. D, 4
0005 - PW	Produced water from the temporary CETCO system was not sampled in July and August 2024.	07/2024 08/2024	Part I, Sec. B, Note 1-2
0005 - PW	Oil & grease sample for produced water was transferred from one container to another during collection.	08/09/2024	Part I, Sec. B, Note 1-2
0005 - PW	No thermometer in sample storage area.	08/09/2024	Part I, Sec. B, Note 1-2
0005 - PW	Produced water samples not collected after final treatment.	08/09/2024	Part II, Sec. C, 4, a-g
0005-PW	Flotation unit for produced water treatment was offline.	08/09/2024	Part II, Sec. B, 3, a

ATTACHMENT D
BSEE Inspection Report Violations
GMG290382
Permitted Feature 0008

Inspection Date: 05/20/2025
BSEE Inspection ID: 553203928
Records Review Period: 7/1/2023-2/28/2025
Lease Area/Block: Viosca Knoll 823

PF/Limit Set	Description of Violations	Violation Date	Permit Citation
0008 - PW	Multiple incomplete chains of custody (COC) for produced water samples.	05/20/2025	Part II, Sec. C, 4, a-g
0008 - PW	Oil and grease samples for produced water not properly preserved when received by the lab with a pH above 2 standard units.	05/20/2025	Part I, Sec. B, Note 1-2
0008 - PW	DMR reports are not consistent with information regarding produced water discharges.	05/20/2025	Part II, Section D, 4
0008 - PW	Multiple DMR produced water oil and grease monthly averages are incorrect.	05/20/2025	Part II, Section D, 4
0008 - PW	Facility personnel are unfamiliar with sheen sampling protocols.	05/20/2025	Part I, Section B, 4, b
0008 - PW	Facility did not have any sheen sampling bottles onsite.	05/20/2025	Part I, Section B, 4, b
0008 - PW	COC not received by lab for the November 2024 oil and grease sample for produced water. It was sent later by the operator.	November 2024	Part I, Sec. B, Note 1-2
0008 - PW	Facility personnel analyze the temperature of the produced water samples by placing the thermometer directly in the sample sent to the lab.	05/20/2025	Part I, Sec. B, Note 1-2
0008 - PW	Facility does not use custody seals on the produced water oil and grease samples.	05/20/2025	Part I, Sec. B, Note 1-2