



REGION 6

DALLAS, TX 75270

October 10, 2025

TRANSMITTED VIA EMAIL

Brent Ozenne, CEO
Arena Offshore, LP
2103 Research Forrest Drive, Suite 200
The Woodlands, Texas 77380
bozenne@arenaoffshore.com

Re: Administrative Order, Docket Number: CWA-06-2025-1796
NPDES Permit: GMG290269

Dear Mr. Ozenne:

Enclosed is an Administrative Order (AO) issued to Arena Offshore, LP (Arena) 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 GMG290269. The AO requires Arena to comply with the provisions set forth in the attached AO for violations identified during a file review for the monitoring periods from March 5, 2024 to May 31, 2025, and from the compliance evaluation inspection conducted by the United States Bureau of Safety and Environmental Enforcement (BSEE) on March 12, 2025. EPA requests that you immediately confirm receipt of this e-mail and the attached order by a response e-mail to mccabe.kerri@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-06-2025-1796 and NPDES Permit Number GMG290269 in your response.

If you have questions, please contact Kerri McCabe of my staff at mccabe.kerri@epa.gov or 214-665-6467.

Sincerely,

Cheryl T. Seager, Director
Enforcement and
Compliance Assurance Division

Enclosures:

Attachment A – Effluent Violations

Attachment B – BSEE Inspection Violations - 0012

Attachment C – BSEE Inspection Violations - 0048

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-06-2025-1796
	§	
Arena Offshore, LP	§	
Respondent	§	ADMINISTRATIVE COMPLIANCE ORDER
	§	
	§	
Facility NPDES Permit No.	§	
GMG290269	§	

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. Arena Offshore, LP (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 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.B of the permit requires Respondent to sample and test 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.

10. 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 the 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.

11. Part II.C.4.a-g of the permit specifies the record contents that Respondent must include with monitoring information.

12. Part II.D.4 of the permit requires Respondent to submit accurate monitoring results for all facilities for which it has permit coverage and to file with EPA certified Discharge Monitoring Reports (DMR) of the results of monitoring and Noncompliance Reports (NCR) when appropriate.

13. EPA conducted a DMR file review for the monitoring period from March 5, 2024, to May 31, 2025.

14. Certified DMRs filed by Respondent with EPA in compliance with the permit show discharges of pollutants from the facilities that exceed the permitted effluent limitations established in Part I.B of the permit at the permitted features and limit sets for the monitoring periods specified in Attachment A, which is incorporated herein by reference.

15. The United States Bureau of Safety and Environmental Enforcement (BSEE) conducted a compliance evaluation inspection on March 12, 2025, at Permitted Feature 0012 located in Eugene Island 338. EPA identified the following permit violations from the inspection, which are specified in Attachment B:

- a. The marine sanitation device (MSD) was not installed at the facility at the time of the inspection, in violation of Part II.B.3 of the permit.
- b. There were discrepancies between the sample chain of custody (COC) and the bottle labels for the June 2023 produced water oil and grease sample, in violation of Part II.C.4. a-g of the permit.
- c. Temperature was not analyzed for produced water samples from May through October 2023, in violation of Part II.D.4 of the permit.
- d. BSEE inspectors observed the following improper sampling methods and quality assurance practices during the inspection and in a review of the records:
 - i. The shipping container used to store the September 2023 produced water oil and grease sample was missing custody seals.
 - ii. The lab adjusted the pH for the February 2023 produced water oil and grease sample.
 - iii. There was no thermometer in the sample storage area.

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

16. BSEE conducted a compliance evaluation inspection on March 12, 2025, at Permitted Feature 0048 located in Eugene Island 314. EPA identified the following permit violations from the inspection, which are specified in Attachment C:

- a. BSEE inspectors observed the following improper sampling method and quality assurance procedure during the inspection and in a review of the records:
 - i. There was no thermometer in the sample storage area.

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

17. 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.

18. 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

19. 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 through C.

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-06-2025-1796, have been corrected and that the Arena Offshore, LP'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 through C.

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 19.A. through 19.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. Kerri McCabe
mccabe.kerri@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 19 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)
Effluent Violations
GMG290269

Reporting for Monitoring Period End Date: 03/05/2024 - 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
03/31/2025	From 01/01/2025 to 03/31/2025	0122-PR	MP-123	82599 - Produced water, oil and grease	C3 DAILY MX	55.7 mg/l	≤ 42 mg/l
03/31/2025	From 01/01/2025 to 03/31/2025	0320-SW	EI, SA-316	82605 - Sanitary waste, residual chlorine	C1 DAILY MN	0 mg/l	≥ 1 mg/l
04/30/2024	From 04/01/2024 to 06/30/2024	0048-PR	EI, SA-314	82599 - Produced water, oil and grease	C3 DAILY MX	79 mg/l	≤ 42 mg/l
02/29/2024	From 01/01/2024 to 03/31/2024	0324-WF	EI, SA-338	04379 - Well fluids, oil & grease	C2 MO AVG	66 mg/l	≤ 29 mg/l
02/29/2024	From 01/01/2024 to 03/31/2024	0324-WF	EI, SA-338	04379 - Well fluids, oil & grease	C3 DAILY MX	66 mg/l	≤ 42 mg/l

¹ MP = Main Pass; EI, SA = Eugene Island, South Addition

ATTACHMENT B
BSEE Inspection Report Violations
GMG290269
Permitted Feature 0012

Inspection Date: 03/12/2025
BSEE Inspection ID: 546264246
Records Review Period: 2/1/2023-1/31/2025
Lease Area/Block: Eugene Island 338

Limit Set	Description of Violations	Violation Date/Range	Permit Citation
SW	The marine sanitation device (MSD) was not installed at the time of the inspection.	03/12/2025	Part II.B.3.a
PR	There were discrepancies between the sample COC and the bottle labels for the June 2023 produced water oil and grease sample.	June 2023	Part II.C.4.a-g
PR	Temperature was not analyzed for produced water samples from May through October 2023.	May – October 2023	Part II.D.4
PR	The shipping container used to store the September 2023 produced water oil and grease sample was missing custody seals.	September 2023	Part I.B. Note 1-2; 40 CFR Part 136
PR	The lab adjusted the pH for the February 2023 produced water oil and grease sample.	February 2023	
	There was no thermometer in the sample storage area.	03/12/2025	

ATTACHMENT C
BSEE Inspection Report Violations
GMG290269
Permitted Feature 0048

Inspection Date: 03/12/2025

BSEE Inspection ID: 546264269

Records Review Period: 2/1/2023-1/31/2025

Lease Area/Block: Eugene Island 314

Limit Set	Description of Violations	Violation Date	Permit Citation
	There was no thermometer in the sample storage area.	03/12/2025	Part I.B Note 1-2; 40 CFR Part 136