



REGION 6

DALLAS, TX 75270

September 29, 2025

TRANSMITTED VIA EMAIL

Jeremy Dugas, Environmental Supervisor
GOM Shelf, LLC
2107 Research Forrest Drive, Suite 250
The Woodlands, Texas 77380
jeremy.dugas@commodoreoffshore.com

Re: Administrative Order, Docket Number: CWA-06-2025-1711
NPDES Permit: GMG290235

Dear Mr. Dugas:

Enclosed is an Administrative Order (AO) issued to GOM Shelf, LLC 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 GMG290235. The AO requires GOM Shelf, LLC to comply with the provisions set forth in the attached AO for violations identified during 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 May 28, 2024. EPA requests that you immediately confirm receipt of this e-mail and the attached order by a response e-mail to lad.uma@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-06-2025-1711 and NPDES Permit Number GMG290235 in your response.

If you have questions, please contact Uma Lad of my staff at lad.uma@epa.gov or 214-665-8563.

Sincerely,

Cheryl T. Seager, Director
Enforcement and
Compliance Assurance Division

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

**UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 6**

IN THE MATTER OF	§	DOCKET NO. CWA-06-2025-1711
	§	
GOM Shelf, LLC	§	
Respondent	§	ADMINISTRATIVE COMPLIANCE ORDER
	§	
	§	
Facility NPDES Permit No.	§	
GMG290235	§	

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. GOM Shelf, LLC (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 National Pollutant Discharge Elimination System (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. Part I.B of the permit requires Respondent to sample and test its 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.
9. Part I.B.9.a of the permit prohibits the discharge of floating solids or visible foam from “Domestic Waste” outfalls. 40 C.F.R. § 435.11(j) defines “Domestic Waste” as materials discharged from sinks, showers, laundries, safety showers, eye-wash stations, hand-wash stations, fish cleaning stations, and galleys located within facilities subject to this subpart.
10. Part II.D of the permit requires Respondent to file with EPA certified Discharge Monitoring Reports (DMRs) of the results of monitoring, and Noncompliance Reports when appropriate.
11. EPA conducted a DMR file review for the monitoring period of May 11, 2023, to May 31, 2025.
12. 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.
13. Multiple DMR non-receipt violations based on reporting requirements under Part II.D.4 of the permit occurred at the permitted features and limit sets for monitoring periods specified in Attachment B, which is incorporated herein by reference. The DMR non-receipt violation identified were failing to conduct sampling or required analyses.
14. The United States Bureau of Safety and Environmental Enforcement (BSEE) conducted a compliance evaluation inspection on May 28, 2024, at Permitted Feature 0222 located in Grand Isle 43, approximately 17 miles offshore from Louisiana’s coast, at an approximate water depth of 110 feet. EPA identified the following permit violation from the inspection, which is also specified in Attachment C.

A. During the inspection, BSEE inspectors observed washing machines at the facility discharge directly to sea. BSEE inspectors also observed visible foam.

15. 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.

16. 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

17. 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, B and 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-06-2025-1711, have been corrected and that the GOM Shelf LLC'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. The 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, B and 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 17.A. through 17.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. Uma Lad
lad.uma@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 17 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
GMG290235

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
02/29/2024	From 01/01/2024 to 03/31/2024	0125-PR	SMI, SA-149	82599 - Produced water, oil and grease	C2 MO AVG	60.8 mg/l	≤ 29 mg/l
02/29/2024	From 01/01/2024 to 03/31/2024	0125-PR	SMI, SA-149	82599 - Produced water, oil and grease	C3 DAILY MX	117 mg/l	≤ 42 mg/l

¹ SMI, SA = South Marsh Island, South Addition

Attachment B
Environmental Protection Agency
Integrated Compliance Information System (ICIS)
DMR Non-Receipt Violations
GMG290235

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
06/30/2024	From 04/01/2024 to 06/30/2024	0176-SW	ST, SA-295	82605 - Sanitary waste, residual chlorine	**E**	08/31/2024	08/21/2024
03/31/2024	From 01/01/2024 to 03/31/2024	0223-PR	GI-47	00010 - Temperature, water deg. centigrade	**E**	05/30/2024	05/21/2024
02/29/2024	From 01/01/2024 to 03/31/2024	0151-PR	SMI, NA-268	00010 - Temperature, water deg. centigrade	**E**	05/31/2024	05/21/2024
02/29/2024	From 01/01/2024 to 03/31/2024	0151-PR	SMI, NA-268	82599 - Produced water, oil and grease	**E**	05/31/2024	05/21/2024
02/29/2024	From 01/01/2024 to 03/31/2024	0151-PR	SMI, NA-268	82599 - Produced water, oil and grease	**E**	05/31/2024	05/21/2024
02/29/2024	From 01/01/2024 to 03/31/2024	0170-SW	SS, SA-274	82605 - Sanitary waste, residual chlorine	**E**	05/31/2024	05/17/2024
01/31/2024	From 01/01/2024 to 03/31/2024	0170-SW	SS, SA-274	82605 - Sanitary waste, residual chlorine	**E**	05/31/2024	05/17/2024
07/31/2023	From 07/01/2023 to 09/30/2023	0041-PR	MP, S&E -311	00010 - Temperature, water deg. centigrade	**E**	11/30/2023	11/14/2023

² ST, SA = South Timbalier, South Addition; MP, S&E = Main Pass, South & East Addition; ST = South Timbalier; GI = Grand Isle; SMI, NA = South Marsh Island, North Addition; SS, SA = Ship Shoal, South Addition

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

ATTACHMENT C
BSEE Inspection Report Violations
GMG290235
Permitted Feature 0222

Inspection Date: 05/28/2024

BSEE Inspection ID: 475839113

Records Review Period: 04/01/2022 – 03/31/2024

Lease Area/Block: Grand Isle 43

Limit Set	Description of Violation	Violation Date(s)
DW	During the inspection, BSEE inspectors observed washing machines at the facility discharge directly to sea. BSEE inspectors also observed visible foam. • Part I.B.9.a of the permit prohibits the discharge of floating solids or visible foam from Domestic Waste outfalls. • Domestic Waste means materials discharged from sinks, showers, laundries, safety showers, eye-wash stations, hand-wash stations, fish cleaning stations, and galleys located within facilities subject to this subpart. [40 CFR 435.11(j)]	05/28/2024