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**U.S. EPA REGION 8
HEARING CLERK**

MM-08-2026-0001

Ref: 8ORC-LE-R

VIA EMAIL

Stephen Furbacher
Vice President, Rockies G&P and NGL Services
The Williams Companies
P.O. Box 2400
Tulsa, OK 74102-2400

Re: Notice of Determination for The Williams Companies' Disclosure of Potential Violations at REP Gathering & Processing, LLC (REP) Facilities Under the Interim Approach to Applying the Audit Policy to New Owners

Mr. Furbacher:

Thank you for transmitting the New Owner Environmental Audit Final Audit Report and related attachments describing steps taken to remedy potential violations at facilities that The Williams Companies (Williams) acquired from REP Gathering & Processing, LLC (REP). Williams' auditing of these facilities, the remedial work done to address the violations found, and the reports made to the EPA meet the terms of the April 9, 2025 New Owner Audit Agreement between Williams and the EPA. The EPA, therefore, is issuing the enclosed Notice of Determination (NOD).

Based on our review of the information submitted by Williams, the EPA has determined that William's disclosures and corrective actions meet the conditions of the EPA's *Incentives for Self-Policing: Discovery, Disclosure, Correction, and Prevention of Violations*, 65 Fed. Reg. 19,618 (April 11, 2000) (Audit Policy) as modified by the *Interim Approach to Applying the Audit Policy to New Owners*, 73 Fed. Reg. 44,991 (August 1, 2008) (Interim Approach) which encourages regulated entities, including new owners, to voluntarily discover, disclose, correct, and take steps to prevent the recurrence of violations at their facilities. The EPA also has determined that no further action and no assessment of civil penalties are required beyond issuance of the NOD.

The EPA reserves the right to revoke its determination if the EPA learns that Williams provided any information or statements that were false or inaccurate at the time the information was provided, and the EPA relied on that information for this determination. The EPA also reserves the right to assess and collect civil penalties for any violation for

which a determination is revoked. Nothing herein shall be construed to limit the authority of the EPA to undertake action against any person, including Williams, in response to any condition that the EPA determines may present an imminent and substantial endangerment to the public health, welfare, or the environment. Further, this determination does not constitute a waiver by the EPA of its right to bring a civil or criminal enforcement action against Williams for any other violation of any federal or state statute, regulation, or permit.

The EPA appreciates William's willingness to independently investigate, discover, disclose, and correct potential violations at its regulated facilities. If you have any questions, please contact Abigail Dean at (303) 312-6106 or dean.abigail@epa.gov.

Sincerely,

Suzanne J. Bohan Director
Enforcement and Compliance Assurance Division

ENCLOSURE

cc: Jon Torizzo
Ashley O'Neill