



REGION 8

DENVER, CO 80202

June 11, 2025

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

Ref: 8ORC-LE-R

VIA EMAIL

Mr. Taylor James
Vice President, Rockies-Colorado
One Williams Center
P.O. Box 2400
Tulsa, OK 74102-2400

Re: Notice of Determination for Williams Field Services Group, LLC's Disclosure of Potential Violations at Cureton Intermediate Holdco, LLC Facilities Under the Interim Approach to Applying the Audit Policy to New Owners MM-08-2025-0001

Dear Mr. James:

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 Williams Field Services Group, LLC (Williams) acquired from Cureton Intermediate Holdco, LLC. 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 New Owner Audit Agreement Williams and the EPA entered into in April 2024. The EPA, therefore, is issuing the enclosed Notice of Determination.

Under the EPA's *Incentives for Self-Policing: Discovery, Disclosure, Correction, and Prevention of Violations*, 65 Fed. Reg. 19,618 (April 11, 2000) (Audit Policy) and the *Interim Approach to Applying the Audit Policy to New Owners*, 73 Fed. Reg. 44,991 (August 1, 2008) (Interim Approach), the EPA encourages regulated entities, including new owners, to voluntarily discover, disclose, correct, and take steps to prevent the recurrence of violations at their facilities.

Based on our review of the information submitted by Williams, the EPA has determined that Williams' disclosures and corrective actions meet the conditions of the Audit Policy as modified by the Interim Approach. The EPA also has determined that no further action and no assessment of civil penalties are required beyond issuance of the Notice of Determination.

Re: *Notice of Determination for Williams Field Services Group, LLC's Disclosure of Potential Violations at Cureton Intermediate Holdco, LLC Facilities Under the Interim Approach to Applying the Audit Policy to New Owners*

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 Williams' 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: Jonathan Torizzo
Jean Crittenden
Ashley O'Neill
Sydney Rippy