

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 6

FILED  
2013 JUL 22 AM 8:52  
REGIONAL HEARING CLERK  
EPA REGION VI

In The Matter Of: § Clean Water Act § 309(a)  
QEP Energy Company §  
Respondent. § ADMINISTRATIVE ORDER  
§ ON CONSENT  
§ Docket No. CWA-06-2013-2717

I. AUTHORITY

The following findings are made and Administrative Order on Consent (“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 (“Act”), 33 U.S.C. § 1319(a). The Administrator of EPA delegated this authority to the Regional Administrator of EPA Region 6, who further delegated such authority to the Director of the Water Quality Protection Division, EPA Region 6.

II. FINDINGS OF VIOLATION

1. QEP Energy Company (“Respondent”) is a corporation authorized to conduct business in Louisiana, and as such, Respondent is “person” as that term is defined by Section 502(5) of the Act, 33 U.S.C. § 1362(5).

2. On March 30, 2012, May 21, 2012, July 9, 2012, and September 7, 2012, Respondent disclosed certain violations of the Act through four voluntary disclosures to EPA (“disclosures”) pursuant to EPA’s Audit Policy, formally titled “Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations,” 65 Fed. Reg. 19618 (April 11, 2000). The disclosures are attached to this Order as Attachments A, B, C and D, and the information included within the disclosures is incorporated herein by reference.

3. At all times relevant to the violations alleged herein, Respondent was engaged in oil and gas development and production activities in Louisiana at multiple locations identified in the disclosures and for which Respondent has asserted its eligibility under EPA's Audit Policy.

4. On multiple dates as described in the disclosures through an audit conducted by Respondent and/or other persons, Respondent determined that Respondent, or entities acting at Respondent's direction and on its behalf ("Respondent's Agents"), discharged pollutants from point sources into waters of the United States without a permit issued under the Act. Specifically, Respondent's audit determined that Respondent and/or Respondent's Agents "discharged dredged material" and "discharged fill material," as those terms are defined by 40 C.F.R. § 232.2, by means of heavy equipment onto wetlands and tributaries as described in the disclosures.

5. The dredged and fill material referenced in paragraph 4 is a "pollutant" as that term is defined by Section 502(6) of the Act, 33 U.S.C. § 1362(6).

6. Each piece of heavy equipment used to carry out the discharges referenced in paragraph 4 was a "point source" as that term is defined by Section 502(14) of the Act, 33 U.S.C. § 1362(14).

7. The impacted wetlands and tributaries referenced in paragraph 4 are "navigable waters" as that term is defined by Section 502(7) of the Act, 33 U.S.C. § 1362(7), and "waters of the United States" as that term is defined by 40 C.F.R. § 232.2.

8. Respondent disclosed violations of Section 301(a) of the Act, 33 U.S.C. § 1311(a), which states it is unlawful for any person to discharge a pollutant from a point source to waters

of the United States except with the authorization of, and in compliance with, a permit issued under the Act. Section 404 of the Act, 33 U.S.C. § 1344, provides that the Secretary of the Army, acting through the Chief of Engineers for the U.S. Army Corps of Engineers (“Corps”), may issue permits for the discharge of dredged or fill material into waters of the United States.

9. Respondent did not have a permit issued by the Corps that authorized the discharges described in paragraph 3 above.

10. In order to correct each of the violations identified through the audit, Respondent applied for after-the-fact (“ATF”) permits from the Corps for the violations listed in the disclosures.

### III. CONSENT AGREEMENT

11. EPA and Respondent agree that entry into this Order is the most appropriate means of resolving this matter with respect to Respondent’s obligations under EPA’s Audit Policy. The purpose of this Order is to facilitate completion of Respondent’s corrective action, the last element of eligibility of the Audit Policy to Respondent’s disclosures.

12. Respondent concurs in the issuance of this Order and agrees to comply with the Order, as set forth in paragraph 13 below.

### IV. ORDER

13. Based on the foregoing Findings of Violation and pursuant to the authority of Section 309(a) of the Act, 33 U.S.C. § 1319(a), EPA orders Respondent to immediately cease any additional discharge of dredged and/or fill material to waters of the United States at the locations identified in the disclosures and referenced in paragraphs 2 and 3. EPA further orders

Respondent to continue to pursue the ATF permits referenced in paragraph 10 and to comply with the terms and conditions of the ATF permits once the ATF permits are issued.

#### V. GENERAL PROVISIONS

14. Except for the right to sustain the eligibility of each disclosure for coverage under the Audit Policy, Respondent waives any and all claims for relief and otherwise available rights or remedies to judicial or administrative review which the Respondent may have with respect to any issue of fact or law set forth in this Order on Consent, including, but not limited to, any right of judicial review of this Order on Consent under Sections 701 through 708 of the Administrative Procedure Act, 5 U.S.C. §§ 701–708.

15. Issuance of this Order on Consent shall not be deemed an election by EPA to forego any administrative or judicial, civil or criminal action to seek penalties, fines or any other relief appropriate under the Act for the violations cited herein or other violations that become known to EPA and is consistent with the application of the Audit Policy.

16. If EPA issues an administrative complaint or a civil judicial action is initiated by the United States Department of Justice, Respondent may be subject to a monetary penalty. The failure to comply with this Order or the Act can result in civil penalties of up to \$37,500 per day of violation. If a criminal action is initiated by the U.S. Department of Justice, Respondent may be subject to a fine and/or imprisonment and may also become ineligible for certain government contracts, grants or loans under Section 508 of the Act, 33 U.S.C. § 1368.

17. Compliance with the terms and conditions of this Order on Consent does not relieve Respondent of its obligation to comply with any applicable federal, state or local law or regulation

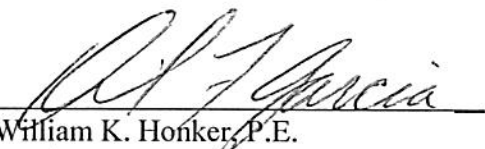
or satisfy Respondent's obligation to correct the violation disclosed pursuant to the Audit Policy.

18. The effective date of this Order on Consent is the date a signed copy is received by Respondent.

In recognition and acceptance of the foregoing:

  
\_\_\_\_\_  
Jay Noese, Executive Vice President  
QEP Energy Company

7/17/13  
Date

*DKG*   
\_\_\_\_\_  
William K. Honker, P.E.  
Acting Director  
Water Quality Protection Division  
U.S. EPA Region 6

7/19/13  
Date

# THOMPSON & KNIGHT LLP

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July 18, 2013

Mr. Tucker Henson (6RC-EW)  
U.S. Environmental Protection Agency, Region 6  
1445 Ross Avenue, Suite #1200  
Dallas, TX 75202-2733  
*Via Federal Express*

RE: QEP Energy Company; Docket No. CWA-06-2013-2717

Dear Tucker:

Enclosed please find the Administrative Order on Consent in the above docket number which has been signed by Jay Neese, Executive Vice President of QEP Energy Company.

Sincerely,



Chris Smith

CDS/cb

**ATTACHMENT A**

**CWA-06-2013-2717**

# THOMPSON & KNIGHT LLP

ATTORNEYS AND COUNSELORS

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March 30, 2012

**Via Certified Mail # 7008 1830 0003 8727 3807  
And Facsimile (214) 665-7446**

Ms. Rhonda Ruple (6EN-X)  
U.S. Environmental Protection Agency, Region 6  
Compliance Assurance and Enforcement Division  
Self Disclosure Audit Reporting  
1445 Ross Avenue, Suite #1200  
Dallas, TX 75202-2733

RE: Voluntary Disclosure of Potential Violations under EPA Audit Policy Discovered Pursuant to Scheduled Environmental Compliance Audit of Oil and Natural Gas Exploration and Production Facilities Owned by QEP Energy Corporation in Northwest Louisiana.

Dear Ms. Ruple:

We represent QEP Energy Corporation ("QEP"). QEP is in the process of conducting a multi-stage, third-party environmental audit of certain of the company's oil and natural gas exploration and production facilities in northwest Louisiana. The environmental audit was initiated with the goal of identifying any issues of noncompliance at certain of QEP's facilities under section 404 of the Clean Water Act. The environmental consulting firm Wildlife Technical Services, Inc. (WTSI) was engaged to assist with the audit. The list of facilities subject to this disclosure is attached as Exhibit A to this letter.

Because of the number of sites included within the scope of the environmental audit, the audit has been separated into multiple phases. In accordance with the EPA's Audit Policy, the purpose of this letter is to disclose to you the potential compliance issues that were discovered during the past 21 days as part of the first stage of the audit. The facilities included in the first stage of the audit are those listed on Exhibit A. If additional issues are discovered during subsequent phases of the audit, we will timely disclose that information to EPA at a later date.

The facilities that were determined to not contain any jurisdictional waters are described as "uplands" under the "wetlands" column of the table. The table further reflects that no permit



Ms. Rhonda Ruple

March 30, 2012

Page 2

is required for these facilities through the "NPR" notation under the "Permit" column. There are no potential violations associated with these facilities.


Potential violations were identified at the other facilities. The type and area of jurisdictional waters impacted are provided on the table, as is the type of after-the-fact permit required. QEP believes that the violations began on or around the date that construction of the facilities began. That date, or in certain instances the date of the first construction invoice or spud date, is provided for each facility. We have also listed the date of discovery, which is the date that the delineation report for each facility was prepared and submitted by WTSI to QEP's counsel. As reflected in the table, all of the potential violations are being disclosed to EPA within 21-days of discovery.

QEP is in the process of correcting all of the issues noted by WTSI by preparing applications for after-the-fact permits for submission to the United States Army Corps of Engineers (USACE). As part of that process, QEP will mitigate all impacts to wetlands and other jurisdictional waters. Because of the USACE's permitting timetable, the Audit Policy's 60-day deadline to complete corrective actions is not obtainable. QEP therefore requests that EPA extend the deadline in order to allow sufficient time for after-the-fact permits to be issued. QEP will fully cooperate with the USACE to ensure prompt issuance of the permits. QEP expects to submit applications for after-the-fact permits to USACE for the facilities identified in this disclosure within the next few weeks.

We do not believe that any of these issues have resulted in actual harm that might have presented an imminent and substantial endangerment to public health or the environment. We do not believe that these issues violate any specific term of any order or consent agreement. Moreover, these issues were voluntarily discovered; they were not discovered through a monitoring, sampling, or auditing procedure that is required by statute, regulation, permit, judicial/administrative order, or consent agreement. Furthermore, QEP has discovered and disclosed these issues independently and on its own initiative as part of an environmental audit, before EPA or another government agency likely would have identified them. Finally, QEP does not believe that any of the issues listed above are repeat violations from the past three years.

QEP is eager to cooperate with the EPA, and believes that these disclosures comply with the Audit Policy. In that regard, please do not hesitate to contact me at 512/469-6130 if you have any questions or require further information regarding this matter.

Very truly yours,



James C. Morriss III

Ms. Rhonda Ruple  
March 30, 2012  
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Enclosed Table (Exhibit A)

Exhibit A



FACILITIES AUDITED IN CWA § 404 ENVIRONMENTAL AUDIT; STAGE 1

Site		Construction	Report	Coordinate		Wetland Impacts		Stream Impacts			Permit
Name	ID	Date	Date	Lat.	Long.	Type	Acres	Type	Linear Ft	Acres	Type
CLARENCE FRIERSON 30	003-ALT	12/5/07*	3/20/12	32.346600	-93.599916	Emergent	1.73				GP19
						Scrub-Shrub	0.25				
CLARENCE FRIERSON 30	002-ALT	12/4/07*	3/21/12	32.344630	-93.598287	Emergent	1.636				GP19
WHITTINGTON 30	006-ALT	9/10/07*	3/21/12	32.344242	-93.610091	Pond	0.12	RPW	314.5	0.029	GP19
								NRPW	173.06	0.012	
WHITTINGTON 30	005-ALT					Emergent	0.009	RPW	404.65	0.037	GP19
WHITTINGTON 30 H	001-ALT	6/29/07*	3/21/12	32.343935	-93.606853	Emergent					GP19
SIMMONS 30	003-ALT	5/13/08*	3/21/12	32.32782683	-93.61368463	Upland	n/a	n/a	n/a	n/a	NPR
CAPLIS 30	003-ALT	5/5/08*	3/21/12	32.32594834	-93.60842365	Upland	n/a	n/a	n/a	n/a	NPR
CAPLIS	009-ALT	10/10/08*	3/21/12	32.32016514	-93.61687457	Upland	n/a	n/a	n/a	n/a	NPR
LS FRIERSON 5	008-ALT	2/6/09*	3/21/12	32.31681917	-93.62069593	Upland	n/a	n/a	n/a	n/a	NPR
LS FRIERSON 5	007-ALT	1/28/09*	3/21/12	32.31151074	-93.62571662	Upland	n/a	n/a	n/a	n/a	NPR
HUTCHINSON 3	002-ALT	6/23/08*	3/21/12	32.31244498	-93.59060643	Upland	n/a	n/a	n/a	n/a	NPR
C M HUTCHINSON JR37 CM HUTCHINSON 37 H	006-ALT	8/26/08*		32.31131031	-93.5953481	Emergent		NRPW	713.06	0.049	GP19
	001	4/20/09**	3/21/12				2.011				
W K CUPPLES 39	008-ALT	5/2/08*	3/22/12	32.31118968	-93.58403671	Upland	n/a	n/a	n/a	n/a	NPR
W K CUPPLES 10 H	001	1/13/09*	3/21/12	32.30998926	-93.57808931	Emergent	0.198				GP19
W K CUPPLES 1	004-ALT	11/4/08*	3/22/12	32.31112971	-93.56371115	Upland	n/a	n/a	n/a	n/a	NPR
CUPPLES	016-ALT	11/4/08*	3/22/12	32.30748465	-93.56139356	Forested					GP19
						Wetland	0.989				
WILLIAM KNIGHT CUPPLES	004	9/22/08***		32.30223903	-93.56245945	Emergent					GP19
SWD CUPPLES SWD	003	1/25/08***	3/22/12				0.547				
CUPPLES	017-ALT	11/4/08*	3/22/12	32.29659232	-93.562171	Emergent	1.27				GP19
CUPPLES	023-ALT	10/14/08*	3/22/12	32.30172777	-93.57002402	Emergent	0.047				GP19
CUPPLES	019-ALT	4/2/08*	3/22/12	32.2984578	-93.56954263	Emergent	0.074				GP19
MCCLELLAN	001-ALT	6/30/08*	3/22/12	32.2948349	-93.5806143	Emergent	0.515				GP19
HUTCHINSON 10 H	001	12/15/08*	3/22/12	32.29668586	-93.59245878	Upland	n/a	n/a	n/a	n/a	NPR
MCCLELLAN	002-ALT	10/10/08***	3/22/12	32.29487237	-93.59300364	Upland	n/a	n/a	n/a	n/a	NPR
W K CUPPLES 1	005-ALT	10/24/08*	3/22/12	32.31930847	-93.57446911			NRPW	21	0.002	NW14
CUPPLES H	002	7/16/09*	3/22/12	32.29744086	-93.55165254	Emergent	0.179	RPW	22	0.002	NW14
KJELL R WAERSTAD SWD	003	5/12/08	3/22/12	32.19447527	-93.54452349	Emergent	1.107				GP19
WAERSTAD	003	9/26/08***									
KJELL R WAERSTAD SWD	004	12/13/08***	3/22/12	32.2240381	-93.54622307	Emergent	1.22				GP19
REX YOUNG 6 H	001										
REX YOUNG SWD	001	7/11/08	3/22/12	32.22396414	-93.53642356	Upland	n/a	n/a	n/a	n/a	NPR
REX YOUNG 6 H	003										
REX YOUNG 6 H	005-ALT			32.22395436	-93.52811893	Emergent	1.857				GP19
REX YOUNG 6 H	004										
REX YOUNG SWD	002	7/8/08	3/23/12								
SAMPLE 4 H	001-ALT	5/2/08	3/23/12	32.22389562	-93.50373475	Emergent	1.63				GP19
SAMPLE 10 H	001										
SAMPLE 10 H	002-ALT	1/14/09	3/23/12	32.22270984	-93.48978718	Upland	n/a	n/a	n/a	n/a	NPR
SAMPLE 2 H	001										
SAMPLE 2 H	002	3/3/09	3/23/12	32.22441813	-93.47357458	Scrub-Shrub	0.34				GP19
BAKER 7 H	001	3/3/09	3/23/12	32.2094096	-93.53961623	Upland	n/a	n/a	n/a	n/a	NPR
BARLOW 13 H	001-ALT	4/24/09	3/23/12	32.19447527	-93.54452349	Scrub-Shrub	1.664				GP19
BRIDGES 31	001-ALT	3/4/09*	3/23/12	32.42303837	-93.53719203	Forested					GP19
						Wetland	2.056				
SCOTT 31	001-ALT	12/12/08*	3/23/12	32.41183969	-93.54291486	Emergent	0.267				GP19
						Forested	1.254				
						Emergent	0.268				
MIMS ETAL	012-ALT	6/6/08*	3/23/12	32.41194613	-93.53012905	Scrub-Shrub	0.646				GP19
						Forested	1.532				



**FACILITIES AUDITED IN CWA § 404 ENVIRONMENTAL AUDIT; STAGE 1**

Site		Construction	Report	Coordinate		Wetland Impacts		Stream Impacts			Permit
Name	ID	Date	Date	Lat.	Long.	Type	Acres	Type	Linear Ft	Acres	Type
PONDER 34	005-ALT	11/18/08*	3/23/12	32.42114849	-93.48348324	Upland	n/a	n/a	n/a	n/a	NPR
HALL 34	001-ALT	10/20/08*	3/23/12	32.4198599	-93.47659578	Forested Wetland	0.81				GP19
WHITTINGTON 34	002-ALT	8/18/08*	3/23/12	32.41443549	-93.47923112	Forested Wetland	1.97				GP19
JACOBS 34	006-ALT	6/23/08*	3/23/12	32.41244796	-93.48139407	Forested Wetland	1.51				GP19
GIBBS 33	001-ALT	6/30/08*	3/23/12	32.4120618	-93.49365202	Forested Wetland	0.16				GP19
CM HUTCHINSON 30-16-12 Frac Pond		1/16/09	3/26/12	32.341592	-93.603355	Emergent	4.697				GP19
CUPPLES 10-15-12 FRAC POND		2/12/09	3/26/12	32.30922	-93.577145	Emergent	2.143				GP19
CUPPLES 11-15-12 FRAC POND		1/27/09	3/26/12	32.297633	-93.561542	Emergent	1.322				GP19
SAMPLE 5-14-11 FRAC POND		6/25/08	3/26/12	32.224024	-93.521276	Upland	n/a	n/a	n/a	n/a	NPR
WEARSTAD 1-14-12 FRAC POND		7/3/08	3/26/12	32.224858	-93.547631	Emergent	2.765				GP19
SAMPLE 10-14-11 FRAC POND		2/6/09	3/26/12	32.222675	-93.491615	Upland	n/a	n/a	n/a	n/a	NPR
YOUNG 7-14-11 FRAC POND		2/14/09	3/26/12	32.213953	-93.540685	Upland	n/a	n/a	n/a	n/a	NPR
BARLOW 13-14-12 FRAC POND		7/2/09	3/26/12	32.198636	-93.548616	Upland	n/a	n/a	n/a	n/a	NPR

\* Denotes the date of the first construction invoice. The actual construction date may have preceded the invoice date.  
 \*\* The well pad was expanded in April 2009 to accommodate the Hutchinson 37H well. Thus, two construction dates are shown for this site.  
 \*\*\* Denotes the spud date of the wells. QEP has not yet determined the start date of construction for these sites.

**ATTACHMENT B**

**CWA-06-2013-2717**

# THOMPSON & KNIGHT LLP

ATTORNEYS AND COUNSELORS

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May 21, 2012

**Via Certified Mail # 7008 1830 0003 8727 4415  
And Facsimile (214) 665-7446**

Ms. Rhonda Ruple (6EN-X)  
U.S. Environmental Protection Agency, Region 6  
Compliance Assurance and Enforcement Division  
Self Disclosure Audit Reporting  
1445 Ross Avenue, Suite #1200  
Dallas, TX 75202-2733

RE: Voluntary Disclosure of Potential Violations under EPA Audit Policy Discovered Pursuant to Scheduled Environmental Compliance Audit of Oil and Natural Gas Exploration and Production Facilities Owned by QEP Energy Corporation in Northwest Louisiana – Phase 2.

Dear Ms. Ruple:

As you know, we represent QEP Energy Corporation (“QEP”). As described in my letter dated March 30, 2012, QEP is in the process of conducting a multi-stage, third-party environmental audit of certain of the company’s oil and natural gas exploration and production facilities in northwest Louisiana. The environmental audit was initiated with the goal of identifying any issues of noncompliance at certain of QEP’s facilities under section 404 of the Clean Water Act. The environmental consulting firm Headwaters Natural Resources Consulting (“Headwaters”) was engaged to assist with the audit. Headwaters recently changed its name from Wildlife Technical Services, Inc.

Because of the number of sites included within the scope of the environmental audit, the audit has been separated into multiple phases. This disclosure represents the second phase of the audit (“Phase 2”). In accordance with the EPA’s Audit Policy, the purpose of this letter is to disclose to you the potential compliance issues that were discovered during the past 21 days as part of Phase 2 of the audit. The facilities included in Phase 2 of the audit are those listed on Exhibit 2-A. If additional issues are discovered during subsequent phases of the audit, we will timely disclose that information to EPA at a later date.

Ms. Rhonda Ruple

May 21, 2012

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The facilities that were determined to not contain any jurisdictional waters are described as "uplands" under the "wetlands" column of the table. The table further reflects that no permit is required for these facilities through the "NPR" notation under the "Permit" column. The audit concluded that there are no potential violations associated with these facilities.

Potential violations were identified at the other facilities. The type and area of jurisdictional waters impacted are provided on the table, as is the type of after-the-fact permit required. QEP believes that the violations began on or around the date that construction of the facilities began. That date, or in certain instances the date of the first construction invoice or spud date, is provided for each facility. We have also listed the date of discovery, which is the date that the delineation report for each facility was prepared and submitted by Headwaters to QEP through counsel. As reflected in the table, all of the potential violations are being disclosed to EPA within 21-days of discovery.

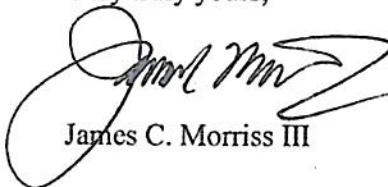
QEP is in the process of correcting all of the issues noted by Headwaters by preparing applications for after-the-fact permits for submission to the United States Army Corps of Engineers (USACE). As part of that process, QEP will mitigate all impacts to wetlands and other jurisdictional waters. Because of the USACE's permitting timetable, the Audit Policy's 60-day deadline to complete corrective actions is not obtainable. QEP therefore requests that EPA extend the deadline in order to allow sufficient time for after-the-fact permits to be issued. QEP will fully cooperate with the USACE to ensure prompt issuance of the permits. QEP expects to submit applications for after-the-fact permits to USACE for the facilities identified in this disclosure within the next few weeks.

We do not believe that any of these issues have resulted in actual harm that might have presented an imminent and substantial endangerment to public health or the environment. We do not believe that these issues violate any specific term of any order or consent agreement. Moreover, these issues were voluntarily discovered; they were not discovered through a monitoring, sampling, or auditing procedure that is required by statute, regulation, permit, judicial/administrative order, or consent agreement. Furthermore, QEP has discovered and disclosed these issues independently and on its own initiative as part of an environmental audit, before EPA or another government agency likely would have identified them. Finally, QEP does not believe that any of the issues listed above are repeat violations from the past three years.

Ms. Rhonda Ruple  
May 21, 2012  
Page 3

QEP is eager to cooperate with the EPA, and believes that these disclosures comply with the Audit Policy. In that regard, please do not hesitate to contact me at 512/469-6130 if you have any questions or require further information regarding this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "James C. Morriss III", is written over a large, stylized circular flourish.

James C. Morriss III

Enclosed Table (Exhibit A)

cc: Tucker Henson, EPA (via E-mail)





**FACILITIES AUDITED IN CWA § 404 ENVIRONMENTAL AUDIT; STAGE 2**

Well		ID	Construction Date	Report Date	Coordinate			Wetland Impacts		Stream Impacts			Permit Type
Name	Lat.				Long.	Type	Acres	Type	Linear Ft.	Acres			
WEYERHAEUSER 10 H	001	7/6/2009*	5/3/12	32.30773811	-93.37708865	Upland	n/a	NRPW	356	0.016	GP19		
BATCHELOR 2 H	001	8/28/2009*	5/3/12	32.30884248	-93.37157388	Upland	n/a	n/a	n/a	n/a	NPR		
DARREL W SHARP 12 H	001	7/20/2009*	5/3/12	32.30802953	-93.34262955	Upland	n/a	n/a	n/a	n/a	NPR		
LEDBETTER 34-1 ALT	001-ALT	1/7/2009*	5/2/12	32.41696815	-93.476591	Forested Wetland	2.196	n/a	n/a	n/a	GP19		
MORRIS 33-3 ALT	003-ALT	1/7/2009*	5/2/12	32.41959836	-93.50499835	Forested Wetland	0.138	n/a	n/a	n/a	GP19		
HOWARD 33-1 ALT	001-ALT	1/7/2009*	5/2/12	32.4156981	-93.49406073	Upland	n/a	n/a	n/a	n/a	NPR		
FRIERSON PROPERTY 30-16-12 LOC A	NA		5/2/12	32.346168	-93.610353	Upland	n/a	n/a	n/a	n/a	NPR		
FRIERSON PROPERTY 30-16-12 LOC B	NA		5/2/12	32.345662	-93.606259	Emergent	0.035	n/a	n/a	n/a	GP19		
SAMPLE 4-3	3	8/18/2009*	5/2/12	32.22408515	-93.49568766	Upland	n/a	NRPW	20	0.002	NW14		
PARKS COMPRESSOR PAD 31-17-11	NA	10/1/2008	5/2/12	32.416552	-93.535126	Forested Wetland	0.131	n/a	n/a	n/a	GP19		
BAKER DEHY 17-14-11	NA		5/2/12	32.195164	-93.512639	Upland	n/a	n/a	n/a	n/a	NPR		
SEELCO 24	001-ALT	11/4/2008*	5/8/12	32.26610802	-93.34620588	Upland	n/a	n/a	n/a	n/a	NPR		
CONLY 30	003-ALT	8/15/2008*	5/8/12	32.2611304	-93.33286677	Upland	n/a	n/a	n/a	n/a	NPR		
CONLY 30 SWD	001	12/19/2009**	5/8/12	32.26130704	-93.33220531	Upland	n/a	n/a	n/a	n/a	NPR		
LAWSON 30	002-ALT	1/5/2009*	5/8/12	32.26291765	-93.32802378	Forested Wetland	1.029	RPW- Seasonal	43.694	0.004	GP19		
LAWSON 30	005-ALT	1/5/2009*	5/8/12	32.25981358	-93.32852645	Forested Wetland	1.222	n/a	n/a	n/a	GP19		
LAWSON 30	004-ALT	1/27/2009*	5/8/12	32.25725828	-93.32664335	Forested Wetland	1.143	RPW- Seasonal	336.176	0.046	GP19		
T CONLY 30	003-ALT	8/15/2008*	5/8/12	32.25677271	-93.33282755	Forested Wetland	0.398	RPW- Seasonal	59.851	0.0027	GP19		
T CONLY 30	002-ALT	7/15/2008	5/8/12	32.25282217	-93.33203166	Upland	n/a	n/a	n/a	n/a	NPR		
LAWSON 30	003-ALT	1/12/2009*	5/8/12	32.25438723	-93.3268214	Upland	n/a	n/a	n/a	n/a	NPR		
SUSTAINABLE FOREST 29	005-ALT	3/10/2009	5/9/12	32.25650686	-93.32168707	Forested Wetland	0.395	n/a	n/a	n/a	GP19		
SUSTAINABLE FOREST 29	006-ALT	6/2/2009*	5/9/12	32.25410384	-93.32090222	Emergent	1.763	n/a	n/a	n/a	GP19		
SAWYER R WIMBERLY JR SWD	001	9/7/2008**	5/9/12	32.25849957	-93.30666182	Upland	n/a	n/a	n/a	n/a	NPR		
HARPER 28	002-ALT	11/25/2008*	5/9/12	32.2581783	-93.30268314	Scrub/shrub Emergent	0.202	n/a	n/a	n/a	GP19		
						Emergent	0.290	n/a	n/a	n/a	GP19		



**FACILITIES AUDITED IN CWA § 404 ENVIRONMENTAL AUDIT; STAGE 2**

Well Name	ID	Construction		Report Date	Coordinate		Wetland Impacts		Stream Impacts			Permit Type
		Date			Lat.	Long.	Type	Acres	Type	Linear Ft	Acres	
HARPER 28	002-ALT	11/25/2008*		5/9/12	32.2581783	-93.30268314	Emergent	0.250	n/a	n/a	n/a	GP19
HARPER 28	003-ALT	11/25/2008*		5/9/12	32.25665494	-93.30275399	Upland	n/a	n/a	n/a	n/a	NPR
KAUFFMAN 28	002-ALT	7/27/2009*		5/10/12	32.25339681	-93.29935487	Upland	n/a	n/a	n/a	n/a	NPR
LEON 28	001-ALT	1/5/2009*		5/10/12	32.25533722	-93.29677404	Forested Wetland	0.490	n/a	n/a	n/a	GP19
KAUFFMAN SWD	001	10/7/2008**		5/10/12	32.25560718	-93.29271328	Upland	n/a	n/a	n/a	n/a	NPR
KAUFFMAN 28	005-ALT	1/22/2009		5/10/12	32.2563452	-93.29073335	Upland	n/a	n/a	n/a	n/a	NPR
KAUFFMAN 28	003-ALT	3/25/2008*		5/10/12	32.25388493	-93.29125528	Forested Wetland	0.900	n/a	n/a	n/a	GP19
KAUFFMAN 28	006-ALT	2/25/2009*		5/10/12	32.25130425	-93.29063512	Forested Wetland	1.200	n/a	n/a	n/a	GP19
KAUFFMAN 28	004-ALT	2/25/2009*		5/10/12	32.25130242	-93.29886767	Upland	n/a	n/a	n/a	n/a	NPR
J WOODARD 27-15-9H	001	6/12/2009*		5/10/12	32.24968249	-93.27313096	Forested Wetland	0.930	n/a	n/a	n/a	GP19
J WOODARD 34-15-9 H	001	4/13/2009			32.2496818	-93.27324417	Emergent	0.120	Seasonal	222.8	0.02	GP19
WOODARD 33	004-ALT	4/28/2009		5/3/12	32.2437888	-93.29634428	Forested Wetland	0.407***	n/a	n/a	n/a	GP19
GOLSON 32 H	001	1/9/2009*		5/3/12	32.23678692	-93.30774609	Forested Wetland	3.620	n/a	n/a	n/a	GP19
SHELBY INTERESTS 31H	001	12/11/2008*		5/4/12	32.23686023	-93.33267348	Forested Wetland	0.138	NRPW	20.021	0.0018	NW14
WIGGINS 36-15-10 H	001	7/25/2008*		5/4/12	32.23773334	-93.342876	Upland	n/a	n/a	n/a	n/a	NPR
NAC 36 H	001-ALT	5/29/2009*		5/4/12	32.23635662	-93.34859889	Upland	n/a	n/a	n/a	n/a	NPR
CONLY SR 27 H	001-ALT	12/3/2009*		5/4/12	32.25041854	-93.37490318	Forested Wetland	0.030	NRPW	442.234	0.02	GP19
CONLY SR 34 H	001-ALT	12/3/2009*		5/4/12	32.25032233	-93.37490226	Forested Wetland	0.062	NRPW	19.929	0.0009	GP19
CONLY 37	001	4/25/2008*		5/4/12	32.24372091	-93.38779398	Forested Wetland	0.025	NRPW	21.879	0.001	NW14
W M CONLY SWD	001	8/23/2008**		5/4/12	32.25194349	-93.38536296	Forested Wetland	n/a	n/a	n/a	n/a	NPR
SUSTAINABLE FOREST 23H	001-ALT	10/14/2009*		5/4/12	32.26546289	-93.37058126	Upland	n/a	n/a	n/a	n/a	NPR
MARY ETAL 14 H	001	9/3/2009		5/4/12	32.27999339	-93.37144661	Forested Wetland	0.052	RPW-Seasonal	20.341	0.002	NW14
Lawson 29	003-ALT	4/1/2009		5/8/12	32.25706067	-93.31721153	Forested Wetland	1.964	RPW-Seasonal	360.836	0.033	GP19
Sust Forest 29	003-ALT	2/5/2009		5/9/12	32.25310265	-93.31799809	Emergent	2.842	n/a	n/a	n/a	GP19



**ATTACHMENT C**

**CWA-06-2013-2717**

ICIS ✓  
EATIS ✓

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July 9, 2012

**Via Certified Mail # 7008 1830 0003 8727 4545  
And Facsimile (214) 665-7446**

Ms. Rhonda Ruple (6EN-X)  
U.S. Environmental Protection Agency, Region 6  
Compliance Assurance and Enforcement Division  
Self Disclosure Audit Reporting  
1445 Ross Avenue, Suite #1200  
Dallas, TX 75202-2733

RE: Voluntary Disclosure of Potential Violations under EPA Audit Policy Discovered Pursuant to Scheduled Environmental Compliance Audit of Oil and Natural Gas Exploration and Production Facilities Owned by QEP Energy Corporation in Northwest Louisiana – Phase 3.

Dear Ms. Ruple:

As you know, we represent QEP Energy Corporation (“QEP”). As described in my letters dated March 30 and May 21, 2012, QEP is in the process of conducting a multi-stage, third-party environmental audit of certain of the company’s oil and natural gas exploration and production facilities in northwest Louisiana. The environmental audit was initiated with the goal of identifying any issues of noncompliance at certain of QEP’s facilities under section 404 of the Clean Water Act. The environmental consulting firm Headwaters Natural Resources Consulting (“Headwaters”) was engaged to assist with the audit. Headwaters recently changed its name from Wildlife Technical Services, Inc.

Because of the number of sites included within the scope of the environmental audit, the audit has been separated into multiple phases. This disclosure represents the third phase of the audit (“Phase 3”). In accordance with the EPA’s Audit Policy, the purpose of this letter is to disclose to you the potential compliance issues that were discovered during the past 21 days as part of Phase 2 of the audit. The facilities included in Phase 3 of the audit are those listed on Exhibit 3-A. If additional issues are discovered during subsequent phases of the audit, we will timely disclose that information to EPA at a later date.

Ms. Rhonda Ruple

July 9, 2012

Page 2

The facilities that were determined to not contain any jurisdictional waters are described as "uplands" under the "wetlands" column of the table. The table further reflects that no permit is required for these facilities through the "NPR" notation under the "Permit" column. The audit concluded that there are no potential violations associated with these facilities.

Potential violations were identified at the other facilities. The type and area of jurisdictional waters impacted are provided on the table, as is the type of after-the-fact permit required. QEP believes that the violations began on or around the date that construction of the facilities began. That date, or in certain instances the date of the first construction invoice or spud date, is provided for each facility. We have also listed the date of discovery, which is the date that the delineation report for each facility was prepared and submitted by Headwaters to QEP through counsel. As reflected in the table, all of the potential violations are being disclosed to EPA within 21-days of discovery.

QEP is in the process of correcting all of the issues noted by Headwaters by preparing applications for after-the-fact permits for submission to the United States Army Corps of Engineers (USACE). As part of that process, QEP will mitigate all impacts to wetlands and other jurisdictional waters. Because of the USACE's permitting timetable, the Audit Policy's 60-day deadline to complete corrective actions is not obtainable. QEP therefore requests that EPA extend the deadline in order to allow sufficient time for after-the-fact permits to be issued. QEP will fully cooperate with the USACE to ensure prompt issuance of the permits. QEP expects to submit applications for after-the-fact permits to USACE for the facilities identified in this disclosure within the next few weeks.

We do not believe that any of these issues have resulted in actual harm that might have presented an imminent and substantial endangerment to public health or the environment. We do not believe that these issues violate any specific term of any order or consent agreement. Moreover, these issues were voluntarily discovered; they were not discovered through a monitoring, sampling, or auditing procedure that is required by statute, regulation, permit, judicial/administrative order, or consent agreement. Furthermore, QEP has discovered and disclosed these issues independently and on its own initiative as part of an environmental audit, before EPA or another government agency likely would have identified them. Finally, QEP does not believe that any of the issues listed above are repeat violations from the past three years.

Ms. Rhonda Ruple  
July 9, 2012  
Page 3

QEP is eager to cooperate with the EPA, and believes that these disclosures comply with the Audit Policy. In that regard, please do not hesitate to contact me at 512/469-6130 if you have any questions or require further information regarding this matter.

Very truly yours,



James C. Morriss III

Enclosed Table (Exhibit 3-A)

cc: Tucker Henson, EPA (via E-mail)

Exhibit 3-A



**FACILITIES AUDITED IN CWA § 404 AUDIT; PHASE 3**

Well		Construction	Report	Coordinate		Wetland Impacts		Stream Impacts			Permit
Name	ID	Date	Date	Lat.	Long.	Type	Acres	Type	Linear Ft	Acres	Type
PHILLIP M GOULD SWD	001	9/9/09*	6/18/12	32.290161	-93.32733	Upland	n/a	n/a	n/a	n/a	NPR
BURNS FOREST 16	003-ALT	8/4/2009	6/18/12	32.289743	-93.304634	Upland	n/a	n/a	n/a	n/a	NPR
BURNS FOREST 16	001-ALT	2/13/09*	6/18/12	32.237824	-93.302976	Forested Wetland	0.995	n/a	n/a	n/a	GP 19
WOODS 16	002-ALT	6/20/2008*	6/18/12	32.28546	-93.303351	Upland	n/a	n/a	n/a	n/a	NPR
WOODS 16	001-ALT	6/23/08*	6/18/12	32.28425	-93.298642	Forested Wetland	0.553	n/a	n/a	n/a	GP 19
WOODS 16	003-ALT										
MICHAEL H L SANDERS ET UX SWD	001	9/8/08*	6/18/12	32.283443	-93.3071875	Upland	n/a	n/a	n/a	n/a	NPR
BURNS FOREST 16	002-ALT	1/23/09*	6/18/12	32.287259	-93.291726	Forested Wetland	1.263	n/a	n/a	n/a	GP 19
BURNS FOREST 16	004-ALT	7/31/2009	6/18/12	32.289152	-93.290034	Forested Wetland	0.013	n/a	n/a	n/a	GP 19
						Emergent Wetlands	0.053				
LAWSON 15	003-ALT	12/12/2008	6/18/12	32.289493	-93.283354	Upland	n/a	n/a	n/a	n/a	NPR
LAWSON 15	002-ALT	12/11/2008	6/18/12	32.284171	-93.280691	Forested Wetland	0.128	n/a	n/a	n/a	GP 19
MARAK 15	001-ALT	5/14/2009	6/18/12	32.28098	-93.286864	Upland	n/a	n/a	n/a	n/a	NPR
SELF 22	001-ALT	9/6/2008	6/18/12	32.275525	-93.282634	Upland	n/a	n/a	n/a	n/a	NPR
BILLY REX HARPER 15H	001	3/9/09*	6/18/12	32.280058	-93.273136	Upland	n/a	n/a	n/a	n/a	NPR
BILLY R HARPER 14 H	001	10/19/2009*	6/18/12	32.278829	-93.264069	Emergent Wetlands	0.457	n/a	n/a	n/a	GP 19
B HARPER 23-15-9 H	001										
EDWARDS 22	001-ALT	7/30/08*	6/18/12	32.272918	-93.276548	Upland	n/a	n/a	n/a	n/a	NPR
WEATHERS 22	001-ALT	10/10/08*	6/18/12	32.270589	-93.280230	Upland	n/a	n/a	n/a	n/a	NPR
WEATHERS 22	002-ALT	8/29/08*	6/18/12	32.268892	-93.284315	Emergent Wetlands	0.128	n/a	n/a	n/a	NW 14
CURVIN O'NEAL SELF SR ETUX SWD	001	12/4/08**	6/18/12	32.268917	-93.287084	Upland	n/a	n/a	n/a	n/a	NPR
BURNS FOREST 21	001-ALT	6/13/2008	6/18/12	32.265813	-93.290727	Upland	n/a	n/a	n/a	n/a	NPR
BECKETT 28-15-9 H	001	5/19/09*	6/18/12	32.265666	-93.290023	Forested Wetland	0.963	n/a	n/a	n/a	GP 19
BURNS FOREST 21	002-ALT										
MARTIN 21	004-ALT	12/12/08*	6/18/12	32.265839	-93.298404	Upland	n/a	n/a	n/a	n/a	NPR
THOMAS 20	005-ALT	2/4/09*	6/19/12	32.271141	-93.3068663	Forested Wetland	0.888	n/a	n/a	n/a	GP 19
KITCHENS 20	002-ALT	7/14/2008	6/19/12	32.269209	-93.3106769	Upland	n/a	n/a	n/a	n/a	NPR
KITCHENS 20	004-ALT										
KITCHENS 20	003-ALT	8/25/2008	6/19/12	32.274884	-93.31136434	Upland	n/a	n/a	n/a	n/a	NPR



Exhibit 3-A



**FACILITIES AUDITED IN CWA § 404 AUDIT; PHASE 3**

Well		Construction	Report	Coordinate		Wetland Impacts		Stream Impacts			Permit
Name	ID	Date	Date	Lat.	Long.	Type	Acres	Type	Linear Ft	Acres	Type
WILKINSON 20	001-ALT	1/2/2009	6/19/12	32.274004	-93.3126424	Upland	n/a	n/a	n/a	n/a	NPR
THOMAS 20	004-ALT	8/12/2008	6/19/12	32.278724	-93.31528097	Upland	n/a	n/a	n/a	n/a	NPR
CONLY ETAL 17	002-ALT	6/12/2009	6/19/12	32.281808	-93.3169715	Upland	n/a	n/a	n/a	n/a	NPR
BECKHAM 18	002-ALT	9/17/2008	6/19/12	32.281327	-93.32555844	Upland	n/a	n/a	n/a	n/a	NPR
HINTZMAN 19 H	001-ALT	8/7/09*	6/19/12	32.278817	-93.32890117	Upland	n/a	n/a	n/a	n/a	NPR
HINTZMAN 19	002-ALT	8/20/2008	6/19/12	32.273802	-93.32532278	Upland	n/a	n/a	n/a	n/a	NPR
B WIMBERLY 29	001-ALT	6/11/2009	6/20/12	32.255951	-93.3110132	Forested Wetland	0.416	RPW Year Round	20.09	0.0055	GP 19
								Non-RPW	20.01	0.0009	
B WIMBERLY 29	002-ALT	6/11/2009	6/20/12	32.257958	-93.31230869	Forested Wetland	0.031	n/a	n/a	n/a	NW 14
S WIMBERLY 29	002-ALT	8/5/08*	6/20/12	32.259876	-93.31328642	Forested Wetland	0.070	n/a	n/a	n/a	GP 19
S WIMBERLY 29	001-ALT	8/5/08*	6/20/12	32.260374	-93.30843813	Upland	n/a	n/a	n/a	n/a	NPR
SUSTAINABLE FOREST 28	002-ALT	2/20/09*	6/20/12	32.261468	-93.30323912	Forested Wetland	0.676	n/a	n/a	n/a	GP 19
WOODARD VILLA INC	002-ALT	2/23/2009	6/18/12	32.26333	-92.2868463	Emergent Wetlands	2.888	n/a	n/a	n/a	GP 19
MARTIN 28	002-ALT	5/13/2008	6/20/12	32.263623	-93.29451953	Upland	n/a	n/a	n/a	n/a	NPR
THOMAS-WILLIAMS 20	003-ALT	11/24/2008	6/20/12	32.267561	-93.31390425	Forested Wetland	0.005	n/a	n/a	n/a	NPR
KITCHENS 29	001-ALT	9/12/2008	6/20/12	32.264822	-93.3165427	Upland	n/a	n/a	n/a	n/a	NPR
JAMES L LOE ET UX SWD	001	10/1/09*	6/21/12	32.274855	-93.28568927	Forested Wetland	0.163	n/a	n/a	n/a	GP 19
SUSTAINABLE FOREST 29 H	001	1/27/2009	6/21/12	32.264326	-93.30739085	Forested Wetland	0.701	n/a	n/a	n/a	GP 19
W. K. CUPPLES 39	010-ALT	10/17/08*	6/21/12	32.312846	-93.577278	Upland	n/a	n/a	n/a	n/a	NPR
WEATHERS 22-15-9 FRAC POND	n/a	4/8/2009	6/21/12	32.270779	-93.282331	Forested Wetland	0.881	n/a	n/a	n/a	GP 19
						Emergent	0.272				
Hall Summitt Facility	n/a	8/1/2009	6/21/12	32.245047	-93.283904	Forested Wetland	0.911	n/a	n/a	n/a	GP 19
						Emergent	0.070				
Woodardville Field Office	n/a	7/10/2009	7/3/12	32.289124	-93.327554	Forested Wetland	2.160	n/a	n/a	n/a	GP 19

\* Denotes the date of the first construction invoice. The actual construction date may have preceded the invoice date.  
 \*\*Denotes the spud date.

**ATTACHMENT D**

**CWA-06-2013-2717**

# THOMPSON & KNIGHT LLP

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September 7, 2012

**Via Certified Mail # 7007 2680 0000 6533 4931  
and Facsimile (214) 665-7446**

Ms. Rhonda Ruple (6EN-X)  
U.S. Environmental Protection Agency, Region 6  
Compliance Assurance and Enforcement Division  
Self Disclosure Audit Reporting  
1445 Ross Avenue, Suite #1200  
Dallas, TX 75202-2733

RE: Voluntary Disclosure of Potential Violations under EPA Audit Policy Discovered Pursuant to Scheduled Environmental Compliance Audit of Oil and Natural Gas Exploration and Production Facilities Owned by QEP Energy Corporation in Northwest Louisiana – Phase 4.

Dear Ms. Ruple:

As you know, we represent QEP Energy Corporation (“QEP”). As described in my letters dated March 30, May 21, and July 9, 2012, QEP is in the process of conducting a multi-stage, third-party environmental audit of certain of the company’s oil and natural gas exploration and production facilities in northwest Louisiana. The environmental audit was initiated with the goal of identifying any issues of noncompliance at certain of QEP’s facilities under section 404 of the Clean Water Act. The environmental consulting firm Headwaters Natural Resources Consulting (“Headwaters”) was engaged to assist with the audit.

Because of the number of sites included within the scope of the environmental audit, the audit has been separated into multiple phases. This disclosure represents the fourth and final phase of the audit (“Phase 4”). In accordance with the EPA’s Audit Policy, the purpose of this letter is to disclose to you the potential compliance issues that were discovered during the past 21 days as part of Phase 4 of the audit. The facilities included in Phase 4 of the audit are those listed on Exhibit 4-A.

The facilities that were determined to not contain any jurisdictional waters are described as “n/a” under the “wetlands” column of the table. The table further reflects that no permit is

required for these facilities through the "NPR" notation under the "Permit" column. The audit concluded that there are no potential violations associated with these facilities.

Potential violations were identified at the other facilities. The type and area of jurisdictional waters impacted are provided on the table, as is the type of after-the-fact permit required. QEP believes that the violations began on or around the date that construction of the facilities began. That date, or in certain instances the date of the first construction invoice or spud date, is provided for each facility. We have also listed the date of discovery, which is the date that the delineation report for each facility was prepared and submitted by Headwaters to QEP through counsel. As reflected in the table, all of the potential violations are being disclosed to EPA within 21-days of discovery.

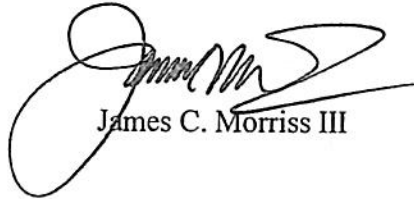
QEP is in the process of correcting all of the issues noted by Headwaters by preparing applications for after-the-fact permits for submission to the United States Army Corps of Engineers (USACE). QEP has submitted such applications for the three prior phases of the audit. As part of that process, QEP will mitigate all impacts to wetlands and other jurisdictional waters. QEP believes that for Phase 4, all of the matters will be resolved through the application of Nationwide Permit 12, or in one case, General Permit 19. As the attached table reflects, the majority of the sites that will require coverage for Phase 4 involve wetland impacts of less than half an acre. Because of the USACE's permitting timetable, the Audit Policy's 60-day deadline to complete corrective actions is not obtainable. QEP therefore requests that EPA extend the deadline in order to allow sufficient time for after-the-fact permits to be issued. QEP will fully cooperate with the USACE to ensure prompt issuance of the permits. QEP expects to submit applications for after-the-fact permits to USACE for the facilities identified in this disclosure within the next few weeks.

We do not believe that any of these issues have resulted in actual harm that might have presented an imminent and substantial endangerment to public health or the environment. We do not believe that these issues violate any specific term of any order or consent agreement. Moreover, these issues were voluntarily discovered; they were not discovered through a monitoring, sampling, or auditing procedure that is required by statute, regulation, permit, judicial/administrative order, or consent agreement. Furthermore, QEP has discovered and disclosed these issues independently and on its own initiative as part of an environmental audit, before EPA or another government agency likely would have identified them. Finally, QEP does not believe that any of the issues listed above are repeat violations from the past three years.

Ms. Rhonda Ruple  
September 7, 2012  
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QEP is eager to cooperate with the EPA, and believes that these disclosures comply with the Audit Policy. In that regard, please do not hesitate to contact me at 512/469-6130 if you have any questions or require further information regarding this matter.

Very truly yours,



James C. Morriss III

JCM/sg

Enclosed Table (Exhibit 4-A)

cc: Tucker Henson, EPA

Via E-mail: [henson.tucker@epa.gov](mailto:henson.tucker@epa.gov)



## FACILITIES AUDITED IN CWA § 404 AUDIT PHASE 4

Pipeline	Construction	Report	Beg. Coordinate		End Coordinate		Wetland Impacts		Stream Impacts			Permit	
			Area-ID	Date	Date	Lat.	Long.	Lat.	Long.	Type	Acres		Type
NEG-2	3/6/09	8/17/12	32.423026	-93.536752	32.418929	-93.535395	Forested	0.294	n/a	n/a	n/a	n/a	NW 12
NEG-3	10/2/08	8/17/12	32.412771	-93.528481	32.411359	-93.528428	n/a	n/a	n/a	n/a	n/a	n/a	NPR
SEG-1	10/15/08	8/17/12	32.310642	-93.562796	32.297880	-93.552161	Emergent	0.201	n/a	n/a	n/a	n/a	NW 12
							Forested	0.205					
SEG-2	4/23/08	8/17/12	32.299396	-93.564104	32.297109	-93.562415	Emergent	0.025	n/a	n/a	n/a	n/a	NW 12
SEG-3	1/14/09	8/17/12	32.302952	-93.571183	32.301717	-93.570723	n/a	n/a	n/a	n/a	n/a	n/a	NPR
SEG-4	10/11/08*	8/17/12	32.298791	-93.568891	32.298690	-93.569116	n/a	n/a	n/a	n/a	n/a	n/a	NPR
SEG-5	10/30/08*	8/17/12	32.298690	-93.593042	32.295277	-93.592638	n/a	n/a	n/a	n/a	n/a	n/a	NPR
SEG-6	10/16/08*	8/17/12	32.294430	-93.580410	32.294156	-93.581130	Emergent	0.030	n/a	n/a	n/a	n/a	NW 12
SEG-7	1/29/09	8/17/12	32.317913	-93.620721	32.316548	-93.621017	n/a	n/a	n/a	n/a	n/a	n/a	NPR
SEG-8	2/21/09	8/17/12	32.311355	-93.625037	32.311142	-93.625659	n/a	n/a	n/a	n/a	n/a	n/a	NPR
SEG-9	8/30/08*	8/17/12	32.311049	-93.583916	32.309150	-93.583872	n/a	n/a	n/a	n/a	n/a	n/a	NPR
SEG-10	6/24/08	8/17/12	32.327766	-93.613704	32.325610	-93.614642	Emergent	0.004	n/a	n/a	n/a	n/a	NW 12
SEG-11	6/24/08	8/17/12	32.327659	-93.608390	32.325958	-93.608040	n/a	n/a	n/a	n/a	n/a	n/a	NPR
SEG-12	3/17/09*	8/17/12	32.319586	-93.572575	32.319026	-93.574017	n/a	n/a	n/a	n/a	n/a	n/a	NPR
SEG-13	6/3/09	8/17/12	32.312831	-93.595333	32.310891	-93.595325	n/a	n/a	n/a	n/a	n/a	n/a	NPR
SEG-14	7/9/08	8/17/12	32.314475	-93.590798	32.311377	-93.589961	n/a	n/a	n/a	n/a	n/a	n/a	NPR
TL-2	06/14/08	8/17/12	32.223269	-93.546391	32.223302	-93.521846	n/a	n/a	n/a	n/a	n/a	n/a	NPR
TL-3	05/03/08	8/17/12	32.223286	-93.521833	32.223313	-93.501294	Emergent	0.005	n/a	n/a	n/a	n/a	NW 12
TL-4	08/01/08	8/17/12	32.222060	-93.511994	32.207200	-93.512893	Emergent	0.470	RPW Seasonal	20	0.005	n/a	NW 12
							Forested	0.787					
TL-5	03/06/09	8/17/12	32.223301	-93.501287	32.223301	-93.495576	Emergent	0.402	n/a	n/a	n/a	n/a	NW 12
							Forested	0.165					
TL-6	07/23/09	8/17/12	32.208840	-93.543891	32.198076	-93.550323	Emergent	0.559	n/a	n/a	n/a	n/a	NW 12
W-1	08/27/08	8/17/12	32.243604	-93.387295	32.242973	-93.382290	n/a	n/a	n/a	n/a	n/a	n/a	NPR
W-2	06/17/08	8/17/12	32.252075	-93.377547	32.242975	-93.382288	n/a	n/a	n/a	n/a	n/a	n/a	NPR
W-3	08/27/08	8/17/12	32.253079	-93.384798	32.252091	-93.377541	Emergent	0.061	n/a	n/a	n/a	n/a	NW 12
							Forested	0.787					
W-4	06/17/08	8/17/12	32.265669	-93.371290	32.267094	-93.342012	Forested	0.155	n/a	n/a	n/a	n/a	NW 12
W-5	11/26/08	8/17/12	32.262384	-93.351217	32.263764	-93.346886	Forested	0.017	n/a	n/a	n/a	n/a	NW 12
			32.266548	-93.345387	2.267143	-93.341985							
W-6	08/08/08	8/17/12	32.278258	-93.329555	32.276903	-93.327984	n/a	n/a	n/a	n/a	n/a	n/a	NPR
			32.275365	-93.327257	32.273351	-93.325560							
			32.273234	-93.330951	32.271411	-93.325418							
W-7	09/12/08	8/17/12	32.254196	-93.332496	32.252797	-93.332543	n/a	n/a	n/a	n/a	n/a	n/a	NPR
W-8	12/5/08	8/17/12	32.261649	-93.330426	32.251804	-93.325180	n/a	n/a	n/a	n/a	n/a	n/a	NPR
W-9	7/28/08	8/17/12	32.251807	-93.325212	32.250969	-93.316133	Forested	0.007	n/a	n/a	n/a	n/a	NW 12
W-10	4/16/09	8/17/12	32.256114	-93.322248	32.250919	-93.321443	n/a	n/a	n/a	n/a	n/a	n/a	NPR
W-11	4/22/09	8/17/12	32.254679	-93.318185	32.250961	-93.316121	n/a	n/a	n/a	n/a	n/a	n/a	NPR
W-12	10/14/08	8/20/12	32.263254	-93.320227	32.265854	-93.310941	Forested	0.057	n/a	n/a	n/a	n/a	NW 12
W-13	8/12/08	8/22/12	32.264958	-93.312915	32.260520	-93.307936	n/a	n/a	n/a	n/a	n/a	n/a	NPR
W-15	6/15/09	8/21/12	32.265000	-93.308257	32.264604	-93.308222	n/a	n/a	n/a	n/a	n/a	n/a	NPR
W-16	1/14/09	8/23/12	32.258228	-93.307100	32.251786	-93.307746	Forested	0.002	n/a	n/a	n/a	n/a	NW 12
W-17	10/20/08	8/22/12	32.257840	-93.302171	32.256063	-93.300798	n/a	n/a	n/a	n/a	n/a	n/a	NPR
W-18	12/9/08	8/22/12	32.256067	-93.300796	32.256268	-93.297348	Forested	0.029	n/a	n/a	n/a	n/a	NW 12
W-20	2/26/2009	8/22/12	32.264975	-93.304237	32.261960	-93.303266	Forested	0.095	n/a	n/a	n/a	n/a	NW 12
W-21	10/1/09	8/23/12	32.250120	-93.288609	32.249456	-93.274020	Forested	0.021	n/a	n/a	n/a	n/a	NW 12
W-22	1/4/10	8/23/12	32.244223	-93.296357	32.243932	-93.291713	Emergent	0.001	n/a	n/a	n/a	n/a	NW 12
W-23	8/25/08	8/20/12	32.264737	-93.296192	32.260127	-93.298048	Emergent	0.016	n/a	n/a	n/a	n/a	NW 12
							Forested	0.029					
W-25	5/27/08	8/17/12	32.268652	-93.298197	32.266923	-93.295245	Emergent	0.029	n/a	n/a	n/a	n/a	NW 12
W-27	6/30/2008	8/17/12	32.268559	-93.291007	32.265284	-93.291312	n/a	n/a	n/a	n/a	n/a	n/a	NPR
W-29	9/30/2008	8/17/12	32.274522	-93.283684	32.272553	-93.281569	n/a	n/a	n/a	n/a	n/a	n/a	NPR
W-30	6/12/08	8/17/12	32.272550	-93.281824	32.272741	-93.279429	n/a	n/a	n/a	n/a	n/a	n/a	NPR
W-31	6/12/08	8/17/12	32.272431	-93.281580	32.270589	-93.280861	n/a	n/a	n/a	n/a	n/a	n/a	NPR
W-32	3/23/2009	8/20/12	32.268560	-93.284448	32.268236	-93.278481	n/a	n/a	n/a	n/a	n/a	n/a	NPR
			32.268483	-93.281308	32.270537	-93.281493							
W-34	8/25/2008	8/22/12	32.281799	-93.291351	32.279666	-93.292976	Forested	0.098	n/a	n/a	n/a	n/a	NW 12
W-35	5/18/2009	8/22/12	32.279678	-93.292955	32.279505	-93.281399	Forested	0.456	n/a	n/a	n/a	n/a	NW 12
W-36	11/25/08	8/22/12	32.287757	-93.280924	32.286550	-93.281266	n/a	n/a	n/a	n/a	n/a	n/a	NPR
W-37	12/23/2008	8/21/12	32.285373	-93.289622	32.283199	-93.291453	Emergent	0.050	n/a	n/a	n/a	n/a	NW 12
							Forested	0.109					


**FACILITIES AUDITED IN CWA § 404 AUDIT PHASE 4**

Pipeline Area-ID	Construction Date	Report Date	Beg. Coordinate		End Coordinate		Wetland Impacts		Stream Impacts			Permit Type
			Lat.	Long.	Lat.	Long.	Type	Acres	Type	Linear ft	Acres	
W-38 Woods 16 No. 3	5/18/2009	8/22/12	32.286629	-93.303887	32.286568	-93.299067	Forested	0.292	n/a	n/a	n/a	GP 19
W-39	12/11/2008	8/20/12	32.286678	-93.303916	32.285867	-93.303829	n/a	n/a	n/a	n/a	n/a	NPR
W-40	4/29/08	8/20/12	32.282993	-93.303102	32.280887	-93.298419	n/a	n/a	n/a	n/a	n/a	NPR
W-41	7/8/08	8/21/12	32.284316	-93.299134	32.280925	-93.298096	n/a	n/a	n/a	n/a	n/a	NPR
W-42	9/5/2008	8/17/12	32.272281	-93.312645	32.270629	-93.314817	n/a	n/a	n/a	n/a	n/a	NPR
W-43	8/23/2008	8/20/12	32.269489	-93.310382	32.268628	-93.314190	Forested	0.012	n/a	n/a	n/a	NW 12
W-44	4/28/2008	8/20/12	32.266968	-93.320761	32.268620	-93.314191	n/a	n/a	n/a	n/a	n/a	NPR
W-45	05/08/08	8/20/12	32.271802	-93.299967	32.269463	-93.302513	n/a	n/a	n/a	n/a	n/a	NPR
W-47	5/18/2009	8/20/12	32.279662	-93.279323	32.280726	-93.273291	n/a	n/a	n/a	n/a	n/a	NPR
W-48	5/18/2009	8/20/12	32.279633	-93.273930	32.279605	-93.269732	n/a	n/a	n/a	n/a	n/a	NPR
W-50	2/3/09	8/21/12	32.256705	-93.290893	32.255528	-93.291995	n/a	n/a	n/a	n/a	n/a	NPR
W-51	9/16/2008	8/23/12	32.255109	-93.286762	32.237081	-93.342908	Emergent	1.066	n/a	n/a	n/a	NW 12
			32.241799	-93.326818	32.246390	-93.327155	Forested	0.228				
W-52	10/20/2009*	8/23/12	32.254983	-93.291917	32.254207	-93.291483	n/a	n/a	n/a	n/a	n/a	NPR
W-53	7/22/2008	8/23/12	32.254364	-93.290743	32.254030	-93.290784	Forested	0.053	n/a	n/a	n/a	NW 12
W-55	2/13/2009	8/21/12	32.253862	-93.302497	32.251995	-93.298326	n/a	n/a	n/a	n/a	n/a	NPR
W-56	10/23/2008	8/23/12	32.249441	-93.305760	32.237402	-93.307493	Emergent	0.265	n/a	n/a	n/a	NW 12
							Forested	0.325				
W-58	10/16/2008	8/28/12	32.239430	-93.333292	32.237422	-93.333222	n/a	n/a	n/a	n/a	n/a	NPR
W-59	06/22/09	8/21/12	32.236586	-93.347760	32.237184	-93.342950	Forested	0.003	n/a	n/a	n/a	NW 12

\* For these facilities, the construction start date could not be determined, and the construction end date is provided.