

**UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 8**



IN THE MATTER OF:

Williams Field Services Group, LLC)
Cureton Intermediate Holdco, LLC) Docket No. MM-08-2025-0001
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)

NOTICE OF DETERMINATION

1. Pursuant to the “Interim Approach to Applying the Audit Policy to New Owners”, 73 Fed. Reg. 44,991 (Aug. 1, 2008) (New Owner Audit Policy), the U.S. Environmental Protection Agency (EPA or Agency) offers tailored incentives and additional penalty mitigation to new owners that want to make a “clean start” at newly acquired facilities by addressing noncompliance that began before the acquisition. The New Owner Audit Policy modifies certain conditions of EPA’s April 11, 2000 “Incentives for Self- Policing: Discovery, Disclosure, Correction and Prevention of Violations,” 65 Fed. Reg. 19,618 (commonly known as the Audit Policy). The EPA hereby issues this Notice of Determination (NOD) regarding violations voluntarily disclosed to the EPA by Williams Field Services Group, LLC (Williams) for the following facilities:

Front Range Gas Plant 40.127056, -104.586044	Gilcrest Gas Plant 40.274425, -104.802103
Hookside Facility 40.714669, -104.131155	Speer Gas Plant 40.265642, -104.714400
Tiger Compressor Station 40.036142, -104.594469	Wiedeman Compressor Station 40.283365, -104.801179
Kersey Compressor Station 40.373107, -104.544170	

Preliminary Statement

2. On November 30, 2023, Williams acquired facilities from Cureton Intermediate Holdco, LLC (Cureton). On March 20, 2024, Williams proposed to enter into a corporate auditing agreement with the EPA. Williams identified violations through an environmental compliance audit that reflected the regulated entity’s due diligence in preventing, detecting, and correcting violations. As an incentive for regulated entities disclosing any violations resulting from an environmental audit, the EPA may eliminate or substantially reduce the gravity-based component of civil penalties to be assessed for violations that are voluntarily disclosed in compliance with the conditions specified in the Audit Policy. For new owners who meet the

conditions of the New Owner Audit Policy, the EPA may eliminate or substantially reduce the economic benefit component of civil penalties to be assessed for self-disclosed violations. As such, Williams performed a voluntary environmental audit of its newly acquired facilities and identified and disclosed to the EPA a number of potential violations uncovered by the audit.

Findings of Fact

3. Williams initially contacted the EPA about entering into a New Owner Audit Agreement on March 20, 2024. The EPA accepted Williams's proposal to audit compliance at its recently acquired Cureton facilities on April 17, 2024.
4. On April 17, 2025, Williams submitted a final report confirming the completion of corrective actions to the EPA.
5. Based on information provided by Williams for the disclosures identified above, the EPA has determined that Williams has met each of the following conditions set forth in the New Owner Audit Policy:
 - a. Williams has certified that the violations were discovered as part of an audit of the listed facilities.
 - b. Williams has certified that the violations were identified voluntarily, not through a monitoring, sampling or auditing procedure required by statute, regulation, permit, judicial order, administrative order, consent decree or consent agreement.
 - c. Williams promptly disclosed and submitted the violations to the EPA in writing.
 - d. Williams has certified that the violations were identified and disclosed prior to the commencement of a federal, state, or local agency inspection, investigation, or information request, notice of a citizen suit, legal complaint by a third party, or imminent discovery by a regulatory agency.
 - e. Williams has certified that it has taken the appropriate steps to correct and remedy the violations listed in the appendix hereto.
 - f. Williams has certified to the EPA that it has taken steps to prevent a recurrence of the violations.
 - g. Williams has certified that the violations at issue have not resulted in serious actual harm to human health or the environment, and that the violations have not presented an imminent and substantial endangerment to public health or the environment. Furthermore, Williams has stated the violations at issue do not violate the specific terms of any judicial order, administrative

order, consent decree or consent agreement.

- h. Williams has cooperated with the EPA and provided the information necessary for the Agency to determine the applicability of the New Owner Audit Policy to its disclosure.
6. Williams stated it meets the definition of a “New Owner,” for purposes of receiving the penalty mitigation incentives provided by the New Owner Audit Policy. Specifically,
- a. Prior to the transaction, Williams was not responsible for environmental compliance at the facilities that are the subject of the disclosure, did not cause the violations being disclosed, and could not have prevented their occurrence;
 - b. The violations that are the subject of the disclosure originated with the prior owner; and
 - c. Prior to the transaction, neither Williams nor the prior owner of the facilities had the largest ownership share of the other entity, and they did not have a common corporate parent.

Determination

7. Based on the review of information and documentation received and in reliance on the Williams certifications, the EPA has determined:
- a. Williams has met all of the conditions of the New Owner Audit Policy and is eligible for a waiver of the total gravity-based civil penalty for the disclosed violations;
 - b. Williams accrued no significant economic benefit of noncompliance as a result of the violations described herein; and
 - c. That this NOD resolves Williams civil penalty liability for the violations described herein with no assessment of a civil penalty.

Reservation of Rights

8. If, and to the extent that, any information or statement provided by Williams upon which this NOD is based was materially false or inaccurate at the time such information or statement was provided to the EPA, the EPA reserves the right to revoke this NOD and, thereby, render such NOD null and void. Such revocation shall be in writing and shall become effective upon receipt by Williams.
9. This NOD applies only to the EPA’s mitigation of the civil monetary penalties for

the violations disclosed. If, and to the extent that, any information or statement provided by Williams upon which any civil penalty mitigation granted herein for such violations was based was materially false or inaccurate at the time such information or statement was provided to the EPA, the EPA reserves the right to assess and collect any and all civil penalties for any violation described herein. Such assessment and collection or the exercise of this reservation shall be in writing and shall become effective upon receipt by Williams.

10. Nothing herein shall be construed to limit the authority of the EPA and/or the United States to undertake action against any person, including Williams, in response to any condition which the EPA or the United States determines may be necessary to protect public health, welfare or the environment. Furthermore, issuance of this NOD does not constitute a waiver by the EPA and/or the United States of its right to bring an enforcement action, either civil or criminal, against Williams for any other violation of any federal or state statute, regulation or permit.
11. In issuing this NOD, the EPA seeks to promote self-auditing and full compliance by Williams with all environmental requirements and to continue the internal procedures necessary to prevent recurrences of violations of environmental requirements.

Suzanne J. Bohan, Director
Enforcement and Compliance Assurance Division