



REGION 8
DENVER, CO 80202

FILED

Jan 26, 2026

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U.S. EPA REGION 8
HEARING CLERK

January 23, 2026

Ref: 8ECA-W-S

SENT VIA EMAIL
DIGITAL DELIVERY RECEIPT REQUESTED

Mr. Manjot Pandher, Owner
Akai Energy-Buford Outpost
mp@akalenergy.com

Subj: Violation of the Administrative Order Issued to Manjot Pandher, Docket No.
SDWA-08-2026-0001, Akai Energy-Buford Outpost Public Water System, PWS ID
#WY5601729

Dear Mr. Pandher:

The purpose of this letter is to notify you that civil penalties and/or a federal court injunction may be ordered against you for violations of the Safe Drinking Water Act, 42 U.S.C. section 300f, *et seq.* (Act) at the Akai Energy-Buford Outpost Public Water System (System). On October 3, 2025, the EPA issued the above-referenced Administrative Order (Order) listing you as the Respondent and directing you to comply with the National Primary Drinking Water Regulations (Part 141) issued by the EPA under the Act. On October 7, 2025, you confirmed receipt of the Order. Our records indicate that the System is currently in violation of the Order.

Among other things, the Order included the following requirements, which have not been properly completed:

Level 1 Assessment.

Summarized from paragraph 17 of the Order: Within 15 calendar days of receipt of the Order, Respondent was required to conduct a Level 1 assessment and submit the attached Revised Total Coliform Rule Level 1 assessment form to the EPA. The assessment must determine the causes of the 2023 and 2025 total coliform-positive samples, identify corrective actions for all sanitary defects, and include a proposed schedule (Schedule) and plan for completion of all corrective actions after consulting with the EPA. The Schedule must be incorporated into this Order with each milestone to be an enforceable requirement upon written approval by the EPA. Within 10 calendar days after completing

all tasks included in the Schedule, Respondent must notify the EPA of the project's completion. Respondent must provide sufficient evidence to the EPA, including photographs of the corrective actions. 40 C.F.R. § 141.859.

- Violation: Failure to Conduct a Level 1 Assessment required by the Order.
 - Respondent did not conduct a Level assessment and submit to EPA within 15 calendar days of receipt of the Order.
 - This violation must be corrected by conducting a Level 1 assessment and submitting it to EPA by February 15, 2026.

Triggered Source Failure to Monitor.

Summarized from paragraph 18 of the Order: Within 48 hours after receipt of the Order, Respondent was required to collect at least one water sample from its groundwater source and have it analyzed for a fecal indicator (e.g., *E. coli*). If a sample is *E. coli* positive, Respondent must notify the EPA immediately for appropriate assistance 40 C.F.R. § 141.403(a)(4). Respondent must comply with the treatment technique requirements, according to 40 C.F.R. § 141.403(a), and provide appropriate public notification pursuant to 40 C.F.R. § 141.402(g) within 24 hours as required by 40 C.F.R. § 141.202(b)(1). Thereafter, Respondent must comply with all source water monitoring and related requirements in 40 C.F.R. § 141.402. When reporting any triggered source water sample result, Respondent must specify that it is a triggered source water sample.

- Violation: Failure to Conduct Triggered Source Monitoring required by the Order.
 - Respondent did not monitor the System's source for a fecal indicator within 48 hours after receipt of the Order.
 - This violation must be corrected by monitoring the System's source for a fecal indicator per paragraph 18 of the Order by February 15, 2026.

Tier 2 Public Notice.

Summarized from paragraph 22 of the Order: Within 30 calendar days after receipt of the Order, and quarterly thereafter as long as the Level 1 assessment violation cited above persists, Respondent was required to notify the public of this violation. Thereafter, following any future violation of Part 141, Respondent must comply with any applicable public notice provisions of 40 C.F.R. part 141, subpart Q. Within 10 calendar days after providing public notice, Respondent must submit a copy of the notice and certification to the EPA. 40 C.F.R. § 141.31(d).

- Violation: Failure to notify the public of violation in paragraph 7 of the Order.
 - Respondent did not notify the public of the violation cited in paragraph 7 of the Order within 30 calendar days after receipt of the Order and did not submit a copy of the Tier 2 public notice and certification to the EPA within 30 calendar days.

Subj: First Violation of the Administrative Order Issued to Manjot Pandher, Akal Energy-Buford Outpost Public Water System, PWS ID #WY5601729

- This violation must be corrected by notifying the public of the violation in paragraph 7 of the Order by February 20, 2026, and submitting a copy of the Tier 2 public notice and certification to the EPA within 30 calendar days after the public is notified.

Tier 3 Public Notice.

Summarized from paragraph 23 of the Order: Within 30 calendar days after receipt of the Order, Respondent was required to notify the public of the violations cited in paragraphs 8, 9, 10, and 11 of the Order. Thereafter, following any future violation of Part 141, Respondent must comply with any applicable public notice provisions of 40 C.F.R. part 141, subpart Q. Within 10 calendar days after providing public notice, Respondent must submit a copy of the notice and certification to the EPA. 40 C.F.R. § 141.31(d).

- Violation: Failure to notify the public of violations in paragraphs 8, 9, 10, 11 of the Order.
 - Respondent did not notify the public of the violations cited in paragraphs 8, 9, 10 and 11 of the Order within 30 calendar days after receipt of the Order.
 - This violation must be corrected by notifying the public of the violations cited in paragraphs 8, 9, 10 and 11 of the Order by February 28, 2026, and submitting a copy of the Tier 3 public notice and certification to the EPA within 30 calendar days after the public is notified.

Violation of any part of this Order, the Act, or Part 141 may subject Respondent to an administrative civil penalty of up to \$71,545 (as adjusted for inflation) per day of violation, a court injunction ordering compliance, or both. 42 U.S.C. § 300g-3(g)(3); 40 C.F.R. part 19; 90 Fed. Reg. at 1375 (January 8, 2025).

The EPA may choose not to file a complaint seeking civil penalties if Respondent does not incur any additional violations and if Respondent provides the EPA with notice of completed corrective action/monitoring regarding the above-referenced violations within 30 calendar days assuming, of course, that the Respondent is in compliance with all other requirements of the Order.

If you have any questions or to request an informal conference with the EPA, please contact Marlon Bell via email at [Bell.marlon@epa.gov](mailto:bell.marlon@epa.gov), or by phone at (800) 227-8917, extension 6539, or (303) 312-6539. Any questions from the Company's attorney should be directed to Noah Stanton, Assistant Regional Counsel, via email at stanton.noah@epa.gov or by phone at (800) 227-8917, extension 6163, or (303) 312-6163.

*Subj: First Violation of the Administrative Order Issued to Manjot Pandher, Akal Energy-Buford Outpost
Public Water System, PWS ID #WY5601729*

We urge your prompt attention to this matter.

Sincerely,

Colleen Rathbone, Manager
Water Enforcement Branch
Enforcement and Compliance Assurance Division

ENCLOSURES

1. Forms

cc:

WY DEQ/DOH (via email)
Albany County Commissioners
EPA Regional Hearing Clerk
Gurjot Singh, Manager
Dennis Lewis, WY DEQ District Engineer