

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

**UNITED STATES OF AMERICA** \* **CRIMINAL NO. 21-02**

**v.**

\* **SECTION: "M"**

**PATRICK HUSE**

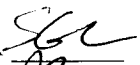
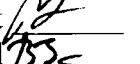

\* \* \*

**FACTUAL BASIS**

The defendant, **PATRICK HUSE**, has agreed to plead guilty as charged to count one of the indictment charging him with violating the Clean Water Act, Title 33, United States Code, Section 1319(c)(1)(A) and 1321(b)(3).

Should this matter have gone to trial, the government would have proven, through the introduction of competent testimony and other admissible evidence, the following facts, beyond a reasonable doubt, to support the allegations in the indictment now pending against the defendant:


Company A is a privately held company with headquarters in Houston, Texas. Company A owns oil production facilities on a federal mineral lease in the Gulf of Mexico. One Company A facility was Main Pass 310A ("MP-310A"). MP-310A was approximately fifteen nautical miles from the shoreline of the state of Louisiana, in a portion of the Gulf of Mexico known as the "Outer Continental Shelf." MP-310A was in the territorial jurisdiction of the Eastern District of Louisiana.

AUSA   
Defendant   
Defense Counsel 

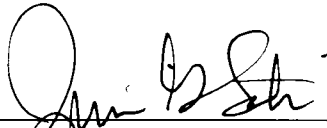
Company A hired third-party operators to operate its platforms. Various Company A employees supervised the operators, including **PATRICK HUSE** (“**HUSE**”). **HUSE** worked as a “Person-in-Charge” (“PIC”) on manned platform MP-310A. As a PIC, **HUSE** had authority over the operators and was responsible for their actions.


When Company A’s oil platforms removed oil from the ground, they also removed “produced water,” or water that contained oil, grease, and other pollutants. The oil platforms discharged the produced water back into the Gulf of Mexico. Company A received a permit from the federal government that specified how clean the produced water needed to be before Company A could discharge it. To comply with the permit, Company A ran the produced water through a filtration process. First, the produced water went through a system known as the “Free Water Knockout,” which separated some oil and gas from the produced water. Then, the produced water went through a device called a “WEMCO,” which removed more of the residual oil. When they functioned properly, the Free Water Knockout and WEMCO systems filtered the produced water to permissible levels before Company A discharged it back into the Gulf of Mexico.


On or about July 19, 2015, operators working on MP-310A observed a sheen on the surface of the water surrounding the platform. The sheen meant that the platform was discharging oil or other hazardous substances into the Gulf of Mexico. The operators reported the sheen to **HUSE**. The operators told **HUSE** they believed that the sheen was caused by sand buildup in the Free Water Knockout and WEMCO filtration systems. Instead of shutting-in the platform as he should have to ensure that the sheening would cease, **HUSE** ordered the workers to remove sand buildup from the filtration equipment. These measures failed to stop the platform from sheening, so the workers decided to stop the sheen through an emergency shutdown of the entire platform. **HUSE’S** failure to timely enact the emergency shutdown caused the discharge a harmful quantity

  
SGL AUSA  
BSC

of oil and other hazardous substances into a water of the United States in connection to activities under the Outer Continental Shelf Lands Act.

 3-31-2022  
\_\_\_\_\_  
SPIRO G. LATSIS Date  
Assistant United States Attorney

 3/31/22  
\_\_\_\_\_  
BRIAN CAPITELLI, ESQ. Date  
Attorney for the Defendant

 3-31-22  
\_\_\_\_\_  
PATRICK HUSE Date  
Defendant