



OFFICE OF INSPECTOR GENERAL
U.S. ENVIRONMENTAL PROTECTION AGENCY

January 14, 2026

MEMORANDUM

SUBJECT: Notification:
Evaluation of EPA Region 8's and a Selected State Agency's Adherence to
Memorandums of Agreement Establishing Requirements for Underground Injection
Control Class VI Primacy Programs
Project No. OSRE-FY26-0035

FROM: Paul H. Bergstrand, Assistant Inspector General
Office of Special Review and Evaluation

TO: Cyrus Western, Regional Administrator
EPA Region 8

The U.S. Environmental Protection Agency Office of Inspector General plans to begin a self-initiated evaluation. Our objective is to determine whether EPA Region 8 and a selected state agency have adhered to the memorandums of agreement establishing primary enforcement authority requirements for the Class VI Underground Injection Control Program. We plan to conduct work at EPA Region 8 and a selected state agency. We will conduct the evaluation using *Quality Standards for Inspection and Evaluation*, issued by the Council of the Inspectors General on Integrity and Efficiency.

We will contact your office to arrange a mutually agreeable time to discuss our objective. At that time, we can discuss any concerns and answer any questions about the evaluation process, reporting procedures, methods used to gather and analyze data, and what we should expect of each other during the evaluation. Throughout the evaluation, we will provide updates on a regular basis.

To expedite our evaluation, please provide the following information as soon as possible after receipt of this notification:

- As cited in 40 C.F.R. § 147.1751(f), the Memorandum of Agreement between EPA Region 8 and the North Dakota Industrial Commission, signed by the EPA Regional Administrator on October 28, 2013. Include any modifications to the memorandum of agreement since it was signed in 2013.
- As cited in 40 C.F.R. § 147.2550(c)(6), the Memorandum of Agreement addendum between EPA Region 8 and the Wyoming Department of Environmental Quality, signed by the EPA Regional

Administrator on March 20, 2020. Include any modifications to the memorandum of agreement addendum since it was signed in 2020.

We respectfully note that the Inspector General Act of 1978, as amended, authorizes the OIG to have timely access to personnel and all materials necessary to complete our objectives. Similarly, EPA Manual 6500, *Functions and Activities of the Office of Inspector General* (1994), requires that each EPA employee cooperate with and fully disclose information to the OIG. Additionally, Administrator Lee Zeldin, in a February 7, 2025, email to EPA employees, said that “the OIG requires information and assistance from EPA managers and staff on a regular basis” and outlined his expectation that EPA employees “report waste, fraud, and abuse to the OIG.” He explained that this “responsibility to report appropriate activity to the OIG is one of the most important and successful means the OIG has for identifying and stopping wrongdoing” and that review and oversight enable the Agency to be more effective in achieving its mission. If an Agency employee or contractor refuses to provide requested materials to the OIG or otherwise fails to cooperate with the OIG, we will request that you immediately resolve the situation. Consistent with the Inspector General Act, we may report unresolved access matters to the administrator and to Congress.

We will post this memorandum on our public website at www.epa.gov/oig. Anyone with knowledge of potential fraud, waste, abuse, misconduct, or mismanagement related to this evaluation should contact the OIG Hotline at (888) 546-8740 or via an electronic form on the “OIG Hotline” [web page](#).

cc: David Fotouhi, Deputy Administrator
Travis Voyles, Associate Deputy Administrator
Eric Amidon, Chief of Staff, Office of the Administrator
Wesley J. Carpenter, Deputy Chief of Staff for Management, Office of the Administrator
Khanna Johnston, Acting Director, Office of Regional Operations
Mark Smith, Deputy Regional Administrator, Region 8
Jennifer McLain, Director, Office of Ground Water and Drinking Water, Office of Water
Terrence Jackson, Director, Office of Administrative and Executive Services, Office of the Administrator
Susan Perkins, Agency Follow-Up Coordinator
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