



## Timothy J. Sullivan

Of Counsel

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### **Tim advises clients on regulations under the Clean Air Act and state and local air pollution statutes and regulations.**

As a former Attorney-Advisor with the U.S. Environmental Protection Agency, Tim counseled on Clean Air Act judicial and administrative enforcement cases and compliance investigations. At EPA, he negotiated enforcement case resolutions, drafted case documents, and conducted investigative case-development work with engineers and policy professionals to advance enforcement policy and priorities.

Tim has extensive experience with the oil and gas industry, developing EPA's Oil and Gas Audit Programs and implementing EPA's National Enforcement and Compliance Initiative for work on Clean Air Act enforcement at exploration, production, and processing sites. Most recently, Tim managed EPA's Clean Air Act fuels enforcement program. Additionally, he worked on issues related to electric generating utilities, diesel engine defeat device investigations, and concentrated animal feeding operations. He has significant experience in matters related to the Clean Air Act, Clean Water Act, Resource Conservation and Recovery Act, Safe Drinking Water Act, Emergency Planning and Community Right-to-Know Act, and the Comprehensive Environmental Response, Compensation, and Liability Act. Tim draws on his vast government experience to provide effective counsel on environmental issues.

Notable experience and achievements from Tim's EPA career include:

- Performed extensive legal work as both a staff and supervisory attorney that supported the Agency's National Enforcement and Compliance Initiative focused on upstream and midstream oil and natural gas operations;
- Served as a litigation team member for: *U.S. & The State of Colorado v. WES DJ Gathering LLC f/k/a Kerr-McGee Gathering LLC* (D. Colo.); *U.S. & The State of Colorado v. K.P. Kauffman Company, Inc.* (D. Colo.); and *U.S. & The State of Colorado v. PDC Energy, Inc.* (D. Colo.);
- Developed and implemented the Oil & Gas Audit Programs for New and Existing Owners;
- Provided legal counsel during groundwater contamination investigations in Pavillion, Wyoming; Parker County, Texas; and Dimock, Pennsylvania;
- Managed the Clean Air Act fuels enforcement program;

- Led Clean Water Act compliance investigations of sector-leading meat processors;
- Developed and implemented the Concentrated Animal Feeding Operation National Enforcement Initiative Strategy and Chesapeake Bay Concentrated Animal Feeding Operation Compliance and Enforcement Strategy; and
- Implemented the Animal Feeding Operations Air Compliance Agreement and the associated National Air Emissions Monitoring Study.

## **Education**

- Boston College (B.A., 2002)
  - Dean's List
- Vermont Law School (M.S.E.L., 2006)
- Vermont Law School (J.D., 2005)

## **Bar Admissions**

- Colorado
- District of Columbia

## **Professional Affiliations**

- American Bar Association - Section of Environment, Energy, and Resources
  - Special Committee on Environmental Justice (2015-2017 Co-Chair, 2017-2019 Vice Chair)
  - Leadership Development Program (2013-2014)
- The Foundation for Natural Resources and Energy Law
- Environmental Law Institute

## **Honors & Awards**

- Department of Justice, Environment and Natural Resources Division, Environmental Enforcement Section Award for legal work as a member of the Kerr-McGee Gathering Litigation Team (2023)
- OECA Team Bronze Medal for legal work as a member of the Audit Policy Refresh Team (2019)
- EPA Region 8 Team Bronze Medal for legal work as a member of the K.P. Kauffman Litigation Team (2019)
- OECA Assistant Administrator's Award for Regional Excellence in Enforcement (2018)

- OECA Team Bronze Medal for work revising an internal national enforcement coordination policy (2015)
- OECA Team Bronze Medal for legal work examining a Supreme Court decision (2012)
- Office of General Counsel Team Bronze Medal for legal work supporting EPA Region 3's concentrated animal feeding operation work (2009)
- OECA Team Bronze Medal for legal work on the PVC Multimedia Enforcement Team (2008)
- OECA Individual Bronze Medal for legal work addressing concentrated animal feeding operation water and air pollution (2006)

## Publications

March 14, 2025

### **EPA's Historic Deregulation Initiative: Implications and Opportunities to Engage**

Beveridge & Diamond

January 29, 2025

### **Outlook for Trump Administration Environment, Energy, and Natural Resource Regulation, Enforcement & Litigation**

Beveridge & Diamond

October 22, 2024

### **EPA Finalizes HFC Emissions Reduction and Reclamation Program**

Beveridge & Diamond

June 18, 2024

### **EPA's Proposed NSR Rule for Project Emissions Accounting Will Mean Permitting Delays for Projects and Expansions**

Beveridge & Diamond

Updated February 16, 2024

### **EPA Proposes Oil and Gas Sector Methane Fee**

Beveridge & Diamond

December 14, 2023

### **EPA Finalizes Air Rule Targeting Oil and Gas Industry Methane Emissions**

Beveridge & Diamond