

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	05/21/2024	
Media Program:	Water (CWA)	
Regulatory Program(s)	Water (CWA) Brine Program (Oil & Gas inspection)	
Company Name:	RCP Production, LLC	
Facility Name:	TD Murphy B-3 SWD Tank Battery	
Facility Physical Location:	From Highway 7 Business, thence Gas Plant Road, thence All Gulf Road, off an oil field lease road in Smackover (Sandy Land) at 33.341155, -92.690976	
(city, state, zip code)	Smackover, AR 71762	
Mailing address:	134 Daniel Road	
(city, state, zip code)	Smackover, AR 71762	
County/Parish:	Union County	
Facility Phone Number	870-814-9942	
Facility Contact:	Rod Phillips rod_phillips2000@yahoo.com	Person Responsible for Operation
FRS Number:	N/A	
Identification/Permit Number:	ARU002227	
Media Identifier Number:	N/A	
NAICS:	211111	
SIC:	1311	
Personnel participating in inspection:		
Kerri McCabe (lead)	EPA / Region 6 ECDW	Inspector / Enforcement Officer
Rod Phillips	RCP Production, LLC	Owner / Operator
EPA Lead Inspector Signature/Date		
	Kerri McCabe	Date
Supervisor Signature/Date		
	Jeanne Eckhart	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 Inspector Kerri McCabe (lead) arrived at the RCP Production, LLC / TD Murphy B-3 SWD Tank Battery release site, located from All Gulf Rd, off an oil lease road in Smackover at 33.341485, -92.686930; at 1422 on 05/21/2024 for an announced inspection. Mr. Rod Phillips, RCP Production, LLC; represented the facility at the time of the inspection. The inspection was conducted by the authority of the Clean Water Act (CWA) to determine compliance with Environmental Protection Agency (EPA) regulations. There were no other federal, state, or local agency representatives present at the time of the inspection.

FACILITY DESCRIPTION

EPA conducted a follow-up inspection on the RCP Production, LLC / TD Murphy B-3 SWD Tank Battery for a release from the tank battery that had occurred on 03/12/2024. EPA collected Total Dissolved Solids (TDS) readings from areas sampled during the 03/12/2024 and 04/02/2024 inspections.



Aerial Image 1. Overview of the area of the release and the associated RCP Production – TD Murphy B-3 SWD well and downstream TDS readings for the impacted wetland and unnamed tributary (UT) of Smackover Creek. Google Earth image date 09/26/2023.

Section II - OBSERVATIONS

I observed the pool in the impacted wetland downstream of the TD Murphy B-3 SWD tank battery. New booms were noted at the influent-side of the road culvert, see Appendix 1 (Photograph Log), Photo No. 1. For additional GPS location and photo metadata, see Appendix 1.

I observed a pump at the pool in the impacted wetland downstream of the TD Murphy B-3 SWD tank battery. The operator, Rod Phillips, stated the pump was used to transfer water from the pool to a pumper truck, which is routed back to the SWD well. See Photo No. 2.

I collected a TDS reading of 1,024 mg/L at the pool in the impacted wetland downstream of the TD Murphy B-3 SWD tank battery. See Photo No. 3.

I observed the area upstream of the pool in the impacted wetland, where the TDS sample was collected. See Photo No. 4.

I observed the area downstream of the pool in the impacted wetland, where the TDS sample was collected. See Photo No. 5 and No. 6.

I collected a TDS reading of 1,158 mg/L from a sample from a bucket filled with water pumped from the pool in the impacted wetland for comparison with the operator's meter and the EPA-issued meter. See Photo No. 7.

I collected a Total Dissolved Solids (TDS) reading of 2,116 mg/L at the All Gulf Rd bridge, which is downstream of the impacted wetland, at an unnamed tributary (UT) of Smackover Creek. See Photo No. 8.

I observed upstream at the UT of Smackover Creek, where the TDS reading was collected. See Photo No. 9.

I observed downstream at the UT of Smackover Creek, where the TDS reading was collected. See Photo No. 10.

I collected a TDS reading of 2,196 mg/L from an area used by Jerry Langley Oil Co., LLC personnel for the collection of flush water from the impacted wetland. See Photo No. 11.

I observed upstream at the collection site, where the TDS reading was collected. See Photo No. 12.

I observed downstream at the collection site, where the TDS reading was collected. See Photo No. 13.

Section III – AREAS OF CONCERN

A closing conference was held with Mr. Rod Phillips, RCP Production, LLC; to discuss the findings of the inspection. Areas of concern at the time of the inspection include the elevated TDS readings from the surface water locations along the length of the discharge conveyance, UT of Smackover Creek.

Section IV – FOLLOW UP

Inspector will conduct follow-up phone calls with the company representative(s) over the coming weeks and months to ensure areas of concern are properly addressed.

Section V – LIST OF APPENDICES

Appendix 1 – Photograph Log – 13 photos taken 05/21/2024.

Appendix 1

Photograph Log 13 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: RCP Production, LLC – TD Murphy B-3 SWD release site from All Gulf Road, off an oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: R0010121

Orientation: W-NW

Date of Photo: 05/21/2024

Time of Photo: 1503

Latitude: 33.341583

Longitude: -92.687000

Photographer: Kerri McCabe

Description: Looking W-NW, this photo showed new booms placed downstream of the RCP Production, LLC – TD Murphy B-3 SWD crude oil and saltwater release into a wetland documented in the 03/12/2024 and 04/02/2024 inspections.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: RCP Production, LLC – TD Murphy B-3 SWD release site from All Gulf Road, off an oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: R0010122

Orientation: NW

Date of Photo: 05/21/2024

Time of Photo: 1504

Latitude: 33.341595

Longitude: -92.686978

Photographer: Kerri McCabe

Description: Looking NW, this photo showed a pump setup at the pool in the wetland downstream of the TD Murphy B-3 SWD release.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: RCP Production, LLC – TD Murphy B-3 SWD release site from All Gulf Road, off an oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: R0010126

Orientation: SW

Date of Photo: 05/21/2024

Time of Photo: 1557

Latitude: 33.341250

Longitude: -92.686950

Photographer: Kerri McCabe

Description: Looking SW, this photo showed the TDS reading of 1,024 mg/L at the pool in the wetland downstream of the TD Murphy B-3 SWD release.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: RCP Production, LLC – TD Murphy B-3 SWD release site from All Gulf Road, off an oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: R0010123

Orientation: NW

Date of Photo: 05/21/2024

Time of Photo: 1504

Latitude: 33.341600

Longitude: -92.687033

Photographer: Kerri McCabe

Description: Looking NW, this photo showed the view upstream of the TDS reading in Photo No. 3.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: RCP Production, LLC – TD Murphy B-3 SWD release site from All Gulf Road, off an oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: R0010124

Orientation: E-NE

Date of Photo: 05/21/2024

Time of Photo: 1504

Latitude: 33.341463

Longitude: -92.686957

Photographer: Kerri McCabe

Description: Looking E-NE, this photo showed the view downstream of the TDS reading in Photo No. 3.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: RCP Production, LLC – TD Murphy B-3 SWD release site from All Gulf Road, off an oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: R0010125

Orientation: N-NE

Date of Photo: 05/21/2024

Time of Photo: 1505

Latitude: 33.341467

Longitude: -92.686850

Photographer: Kerri McCabe

Description: Looking N-NE, this photo showed an additional view of the downstream location in Photo No. 5.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: RCP Production, LLC – TD Murphy B-3 SWD release site from All Gulf Road, off an oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: R0010130

Orientation: NE

Date of Photo: 05/21/2024

Time of Photo: 1606

Latitude: 33.341467

Longitude: -92.686850

Photographer: Kerri McCabe

Description: Looking NE, this photo showed the TDS reading of 1,158 mg/L from a sample collected by the pump in Photo No. 2. The sample was used to compare the operator's meter with the EPA-issued meter.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: RCP Production, LLC – TD Murphy B-3 SWD release site from All Gulf Road, off an oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: R0010134

Orientation: NE

Date of Photo: 05/21/2024

Time of Photo: 1705

Latitude: 33.346167

Longitude: -92.682900

Photographer: Kerri McCabe

Description: Looking NE, this photo showed the TDS reading of 2,116 mg/L at the All Gulf Rd bridge, which is the downstream location for the wetlands in Photo No. 1 and No. 2 and No. 4 through No. 6.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: RCP Production, LLC – TD Murphy B-3 SWD release site from All Gulf Road, off an oil field lease road at 33.341155, -92.690976.		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010136

Orientation: W-SW

Date of Photo: 05/21/2024

Time of Photo: 1705

Latitude: 33.346167

Longitude: -92.682900

Photographer: Kerri McCabe

Description: Looking W-SW, this photo showed the upstream view of the receiving stream, unnamed tributary (UT) of Smackover Creek, for the TDS reading in Photo No. 8.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: RCP Production, LLC – TD Murphy B-3 SWD release site from All Gulf Road, off an oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: R0010135

Orientation: NE

Date of Photo: 05/21/2024

Time of Photo: 1705

Latitude: 33.346167

Longitude: -92.682900

Photographer: Kerri McCabe

Description: Looking NE, this photo showed the downstream view of the receiving stream, UT of Smackover Creek, for the TDS reading in Photo No. 8.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: RCP Production, LLC – TD Murphy B-3 SWD release site from All Gulf Road, off an oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: R0010139

Orientation: NW

Date of Photo: 05/21/2024

Time of Photo: 1723

Latitude: 33.343233

Longitude: -92.684133

Photographer: Kerri McCabe

Description: Looking NW, this photo showed the TDS reading of 2,196 mg/L for a location upstream of the All Gulf Rd bridge site in Photo No. 8 through No. 10.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: RCP Production, LLC – TD Murphy B-3 SWD release site from All Gulf Road, off an oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: R0010140

Orientation: W-SW

Date of Photo: 05/21/2024

Time of Photo: 1723

Latitude: 33.343233

Longitude: -92.684133

Photographer: Kerri McCabe

Description: Looking W-SW, this photo showed the upstream view of the receiving stream, UT of Smackover Creek, for the TDS reading in Photo No. 11.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: RCP Production, LLC – TD Murphy B-3 SWD release site from All Gulf Road, off an oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: R0010141

Orientation: N

Date of Photo: 05/21/2024

Time of Photo: 1724

Latitude: 33.343233

Longitude: -92.684133

Photographer: Kerri McCabe

Description: Looking N, this photo showed the downstream view of the receiving stream, UT of Smackover Creek, for the TDS reading in Photo No. 11.