

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	11/06/2019	
Media Program:	Water, Clean Water Act, National Pollution Discharge Elimination System	
Regulatory Program(s)	Oil and Gas, Produced Water	
Company Name:	Jamie Oil, Inc.	
Facility Name:	Gulf Lease	
Facility Physical Location:	33.170610N, -92.501498W	
(city, state, zip code)	El Dorado, Arkansas 71730	
Mailing address:	117 Foxwood	
(city, state, zip code)	Hot Springs, Arkansas 71913	
County/Parish:	Union	
Facility Phone Number	870-814-5299	Main Office
Facility Contact:	Main Office	N/A
	N/A	
FRS Number:	N/A	
Identification/Permit Number:	ARU001272	
Media Identifier Number:	N/A	
NAICS:	211111	
SIC:	1311	
Personnel participating in inspection:		
Kent W. Sanborn	U.S. EPA, Region 6, ECDWE	918-557-1615
EPA Lead Inspector Signature/Date		
	Kent W. Sanborn	Date
Supervisor Signature/Date		6 DEC 2019
	Guy Tidmore	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector Kent W. Sanborn arrived at the Jamie Oil, Inc. Gulf Lease located Northeast of El Dorado, Arkansas at about 9:00 AM on November 6, 2019 for an unannounced inspection. There were no company representatives at the site. The inspection was conducted to determine the facility's compliance with the Clean Water Act (CWA). The scope of the inspection was to determine if the facility was in compliance with the CWA, and to identify and document unauthorized discharges of produced wastewater (brine) to a water of the United States. The inspection was a follow-up to previous inspections that documented unauthorized discharges of produced water at the facility.

FACILITY DESCRIPTION

The discharge of produced water originated from the facility located on the Gulf Lease, where brine was stored and a flow line running at the lease connecting one or two producing wells in the vicinity to the tank battery. The discharge of produced water had reached North Creek, which I observed during the inspection. I observed some minor cleanup activity that included absorbant spread on the oil at the discharge site. I observed that the discharge had recently occurred and could be several months old.

Section II - OBSERVATIONS

I initially arrived at the Jamie Oil, Inc., Gulf Lease at about 9:00 am November 6, 2019. Photos 1 and 2 show the location of the source of the discharge of produced water, or brine. Photo 3 showed dead and dying trees at the discharge site. The brine and some oil were pooled up in a ditch downstream from the discharge site (Photo 4). With a calibrated YSI Pro 30 Conductivity Meter, a Total Dissolve Solids (TDS) reading was measured in the pool and was 34,775 milligrams per liter (mg/L) (Photo 5). Photo 6 showed the discharge flow path north toward North Creek. A sign at a producing oil well near the point of entry to the creek was shown in Photo 7. Photos 8 and 9 indicated the location of the point of entry of the where the brine flowed into North creek. The TDS of the flowing creek measured 13,971 mg/L (Photo 10). Photo 11 showed the typical surface water drainage in the area near the point of entry to North Creek. The TDS upstream measured 47.8 mg/L (Photo 12). I observed that North Creek several miles downstream from the point of entry was a much larger and faster flowing water body (Photo 13). I observed several fish at this downstream location. A slight oil sheen (Photo 14) was also present during the inspection at this location.

Section III – AREAS OF CONCERN

There was surface damage and a flow path of produced water from the facility, including a flow line. There were elevated levels of TDS identified along the flow path and in North Creek. There was oil and oil sheen observed as well along the flow path and in North Creek.

Section IV – FOLLOW UP

A follow up inspection will be conducted as needed. This facility will be referred to EPA water enforcement.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 14 photos taken 11/6/2019.

Appendix 1

Photographic Log (14 photos)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

33.170610N, -92.501498W		
City: El Dorado	County: Union	State: Arkansas



Photo File Name: Photo 1 (DSC_0015)

Orientation: South

Date of Photo: 11/6/2019

Time of Photo: 10:21am

Latitude: 33.170610N

Longitude: -92.501498W

Photographer: K.W. Sanborn

Description: I observed a discharge of produced water, or brine, had occurred in this drainage ditch in the woods south of North Creek. A potential flow line failure was the evident source of the point of discharge of brine. I observed oil and brine fluids here and along the flow path downstream, towards North Creek from this location.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

33.170610N, -92.501498W		
City: El Dorado	County: Union	State: Arkansas



Photo File Name: Photo 2 (DSC_0019)

Orientation: South

Date of Photo: 11/6/2019

Time of Photo: 10:21am

Latitude: 33.170610N

Longitude: -92.501498W

Photographer: K.W. Sanborn

Description: I observed brine and oil fluids pooled up here, along the flow path towards North Creek. There was dead vegetation observed at this location as well.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

33.170610N, -92.501498W		
City: El Dorado	County: Union	State: Arkansas



Photo File Name: Photo 3 (DSC_0018)

Orientation: South

Date of Photo: 11/6/2019

Time of Photo: 10:21am

Latitude: 33.170610N

Longitude: -92.501498W

Photographer: K.W. Sanborn

Description: There were dead and dying trees after exposure to brine along the flow path, where elevated brine levels were measured.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

33.170610N, -92.501498W		
City: El Dorado	County: Union	State: Arkansas



Photo File Name: Photo 4 (DSC_0016)

Orientation: North

Date of Photo: 11/6/2019

Time of Photo: 10:21am

Latitude: 33.170610N

Longitude: -92.501498W

Photographer: K.W. Sanborn

Description: I observed fluids, including brine pooled up downstream of the discharge point and lease road crossing. This location was on the flow path toward North Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

33.170610N, -92.501498W		
City: El Dorado	County: Union	State: Arkansas



Photo File Name: Photo 5 (DSC_0020)

Orientation: North

Date of Photo: 11/6/2019

Time of Photo: 10:22am

Latitude: 33.170610N

Longitude: -92.501498W

Photographer: K.W. Sanborn

Description: With a calibrated YSI Pro 30 Conductivity Meter, I took a Total Dissolved Solids (TDS) reading of the pool shown in Photo 4 and it measured 34,775 milligrams per liter (mg/L).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

33.170610N, -92.501498W		
City: El Dorado	County: Union	State: Arkansas



Photo File Name: Photo 6 (DSC_0017)

Orientation: Northwest

Date of Photo: 11/6/2019

Time of Photo: 10:21am

Latitude: 33.170610N

Longitude: -92.501498W

Photographer: K.W. Sanborn

Description: The trail of the brine discharge flowed north toward the point of entry to North Creek. I observed intermittent holes of brine along the flow path between here and North Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

33.170610N, -92.501498W		
City: El Dorado	County: Union	State: Arkansas



Photo File Name: Photo 7 (DSC_0021)

Orientation: North

Date of Photo: 11/6/2019

Time of Photo: 10:31am

Latitude: 33.172381N

Longitude: -92.500635W

Photographer: K.W. Sanborn

Description: This was a producing well located near the point of entry to North Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

33.170610N, -92.501498W		
City: El Dorado	County: Union	State: Arkansas



Photo File Name: Photo 8 (DSC_0022)

Orientation: North

Date of Photo: 11/6/2019

Time of Photo: 10:32am

Latitude: 33.1741N

Longitude: -92.4993W

Photographer: K.W. Sanborn

Description: A bridge crossing near the point of entry to North Creek was observed here.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

33.170610N, -92.501498W		
City: El Dorado	County: Union	State: Arkansas



Photo File Name: Photo 9 (DSC_0023)

Orientation: West

Date of Photo: 11/6/2019

Time of Photo: 10:32am

Latitude: 33.1741N

Longitude: -92.4993W

Photographer: K.W. Sanborn

Description: I observed the point of entry to North Creek here. The creek was flowing north during the inspection.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

33.170610N, -92.501498W		
City: El Dorado	County: Union	State: Arkansas



Photo File Name: Photo 10 (DSC_0025)

Orientation: West

Date of Photo: 11/6/2019

Time of Photo: 10:33am

Latitude: 33.1741N

Longitude: -92.4993W

Photographer: K.W. Sanborn

Description: The TDS at the point of entry measured 13,971 mg/L.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

33.170610N, -92.501498W		
City: El Dorado	County: Union	State: Arkansas



Photo File Name: Photo 11 (DSC_0027)

Orientation: South

Date of Photo: 11/6/2019

Time of Photo: 10:34am

Latitude: 33.1720N

Longitude: -92.4995W

Photographer: K.W. Sanborn

Description: This was a view of another small drainage, or tributary, coming from the east, and entered North Creek near the main point of entry of the brine. It was not affected by the spill.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

33.170610N, -92.501498W		
City: El Dorado	County: Union	State: Arkansas



Photo File Name: Photo 12 (DSC_0026)

Orientation: East

Date of Photo: 11/6/2019

Time of Photo: 10:34am

Latitude: 33.1720N

Longitude: -92.4995W

Photographer: K.W. Sanborn

Description: The TDS of background water, or the unaffected tributary entering the upstream from the point of entry of brine on North Creek measured 47.8 mg/L.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

33.170610N, -92.501498W		
City: El Dorado	County: Union	State: Arkansas



Photo File Name: Photo 13 (DSC_0029)

Orientation: West

Date of Photo: 11/6/2019

Time of Photo: 11:13am

Latitude: 33.1852N

Longitude: -92.4761W

Photographer: K.W. Sanborn

Description: This was North Creek several miles downstream from the point of entry of brine into North Creek. I observed that the creek at this location was large and the TDS at this location indicated the water did not have elevated TDS levels in it.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

33.170610N, -92.501498W		
City: El Dorado	County: Union	State: Arkansas

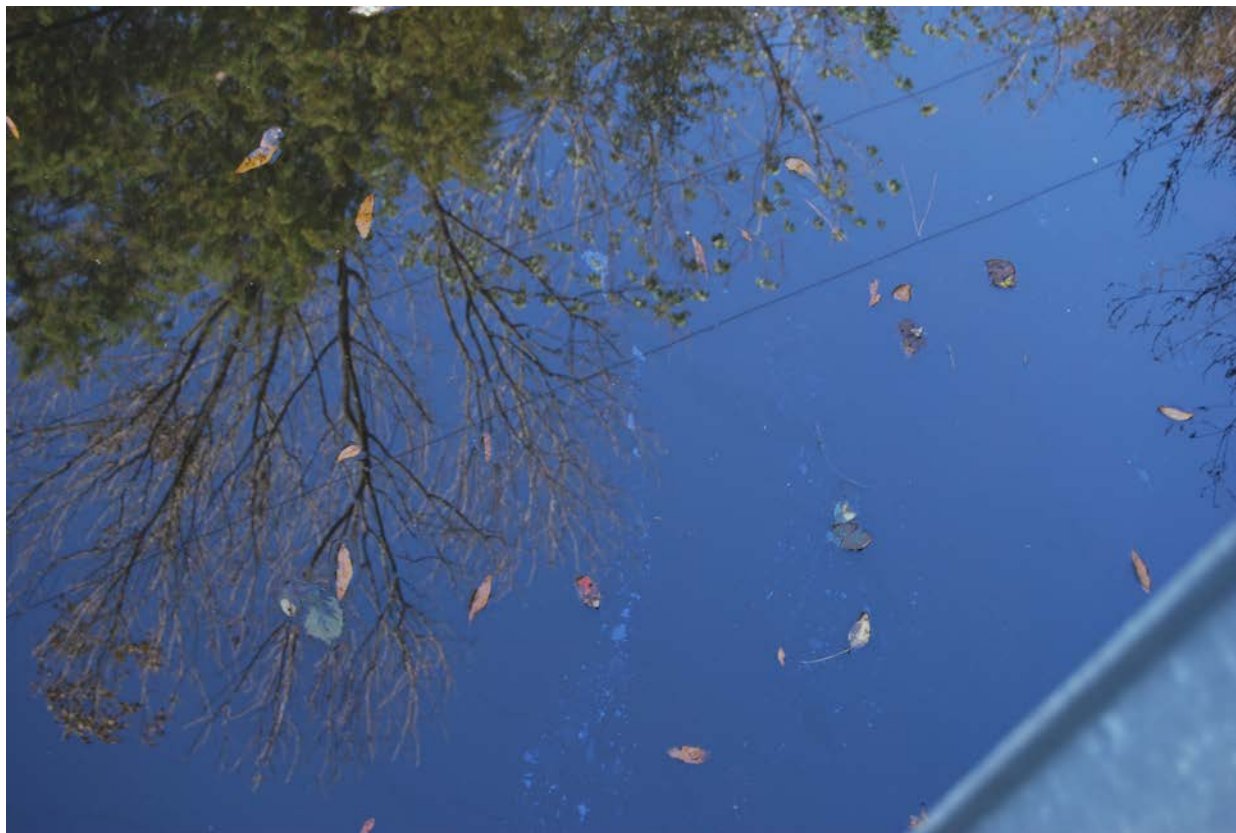


Photo File Name: Photo 14 (DSC_0030)

Orientation: West

Date of Photo: 11/6/2019

Time of Photo: 11:13am

Latitude: 33.1852N

Longitude: -92.4995W

Photographer: K.W. Sanborn

Description: This photo was the same location on North Creek as shown in Photo 13. I observed a slight oil sheen on North Creek at this location.