

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	02/06/2024	
Media Program:	Water	
Regulatory Program(s)	Clean Water Act-National Pollution Discharge Elimination System (Brine)	
Company Name:	JTWROS OIL AND GAS	
Facility Name:	Edwards Lease	
Facility Physical Location:	Latitude: 36.633831, Longitude: -96.318018	
(city, state, zip code)	Pawhuska, OK, 74056	
Mailing address:	PO BOX 808	
(city, state, zip code)	Pawhuska, OK, 74056	
County/Parish:	Osage	
Facility Phone Number	918-639-4920	
Facility Contact:	Judy Thomas	Owner
	Spriest5@yahoo.com	
FRS Number:	n/a	
Identification/Permit Number:	OKU002199	
Media Identifier Number:	n/a	
NAICS:	211111	
SIC:	1311	
Personnel participating in inspection:		
Matthew Allen	EPA/Region 6 ECDW	Inspector
Mike Perrier	BIA, Osage Agency	Field Inspector
EPA Lead Inspector Signature/Date		
	Matthew Allen	Date
Supervisor Signature/Date		
	(acting) Mitty Garcia	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 Inspector, Matthew Allen, arrived at the JTWROS OIL AND GAS / Edwards Lease (EPA ID No. OKU002199) at 4:30 P.M. on 02/06/2024 to conduct an unannounced inspection. This was an EPA inspection in response to a National Response Center Spill Report (NRC No. 1390972) which was received by EPA Region 6. The inspection was conducted by the authority of the Clean Water Act (CWA) to determine compliance with Environmental Protection Agency (EPA) regulations. Judy Thomas, owner of JTWROS OIL AND GAS was present for the opening and closing conference of the inspection. BIA, Osage Agency Field Inspector, Mike Perrier was present and participated during the inspection. There was no other federal, state, or local agency representative present at the time of the inspection.

FACILITY DESCRIPTION

EPA conducted an inspection at the JTWROS OIL AND GAS / Edwards Lease where a steel flowline between well #2 and the Edwards Tank Battery failed, releasing produced water and crude oil onto the ground. The oil and produced water migrated northeast over land, eventually entering an unnamed tributary of Quapaw Creek. The NRC Spill Report stated approximately 10 barrels of crude oil and 100 barrels of produced water/saltwater was released to the land.

Section II - OBSERVATIONS

I observed the JTWROS OIL AND GAS (dba. CSC OIL CO), Edwards Lease Tank Battery facility sign. See Appendix 1 (photo log) photo No. 1. For additional GPS location information and photo metadata, see the attached photo log.

I observed the release point of the spill (GPS 36.633831, -96.318018). At the time of the inspection, the lease operator had installed a temporary repair claim on the leaking flowline to prevent additional fluids from being released. At the same location, I observed pooled oil, oil-stained soil, vegetation and the overland flowpath which traveled in a general east and northeast direction. See photos No. 2 and 3.

At the base of the hill, I observed a drainage feature with a significant amount of pooled oil. The pooled oil ranged in width between 10 feet and 15 feet. There was no defined bed or bank features associated with the drainage feature. There was no change in vegetation type along the drainage. See photos No. 4 and 5.

I observed the point of entry (POE) (GPS 36.635083, -96.316214) into an unnamed tributary of Quapaw Creek. At the same location, I observed a temporary containment dam and oil absorbent booms which had been installed by the operator to prevent downstream migration of spill impacts. See photos No. 6 and 7 for upstream and downstream views of the impacted tributary.

Continuing downstream, I observed an elevated total dissolved solids (TDS) field reading of 21920 mg/L. This was the highest TDS reading observed during the inspection. This was observed in a pool of water which had been emptied one time by a vacuum truck as part of the ongoing cleanup activities. This was the first location the YSI Pro 30 conductivity probe could be deployed without risk of contaminating the sampling probe. At this same location, I observed “sphag sorb” (an industrial oil absorbent) which had been applied to the impacted tributary to tie up loose oil. See photos No. 8 and 9.

I observed the lowermost temporary containment dam, the end of spill impacts, and an elevated TDS field reading of 6022 mg/L. These observations were all made at the same location. At this location, the impacted tributary spilled into and out of a small stock pond. The containment dam was properly placed and was preventing spill impacts from migrating downstream at the time of the inspection. See photos No. 10, 11 and 12.

Approximately 400 feet downstream from the lowermost containment dam, I observed the POE of the impacted tributary into Quapaw Creek. I observed a TDS field reading of 124 mg/L at this location, which indicated there was no impact to Quapaw Creek at the time of the inspection. This TDS reading should be used when establishing “background” TDS levels for the area. See photos No. 13 and 14.

I observed no additional spill impacts downstream from the location of photo No. 14.

All TDS field readings were taken with a properly calibrated, EPA issued YSI Pro 30 conductivity meter.

Section III – AREAS OF CONCERN

Areas of concern included oil and produced water along the overland flowpath and throughout the impacted portion of the unnamed tributary of Quapaw Creek. The elevated TDS observation in the stock pond at the endpoint of the impacted area should also be addressed.

Section IV – FOLLOW UP

Inspector will conduct follow-up inspection to ensure TDS levels have returned to “background” levels and the risk of future unpermitted discharges has been reduced.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 14 photos taken 02/06/2024

Appendix 1

Photograph Log 14 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: 36.633831, -96.318018		
City: Pawhuska	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010300

Orientation: W

Date of Photo: 02/06/2024

Time of Photo: 4:41 PM

Latitude: 36.

Longitude: -96.

Photographer: Matthew Allen

Description: This was the JTWROS OIL AND GAS (dba. CSC OIL CO.) Edwards lease facility sign showing the lease name and operator's phone number.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: 36.633831, -96.318018		
City: Pawhuska	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010301

Orientation: N/A

Date of Photo: 02/06/2024

Time of Photo: 5:19 PM

Latitude: 36.633831

Longitude: -96.318018

Photographer: Matthew Allen

Description: This was a temporary repair clamp on the 2" steel line which had been installed by the operator to prevent additional oil/produced water from spilling to the soil. This was the release point of the spill.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: 36.633831, -96.318018		
City: Pawhuska	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010302

Orientation: ENE

Date of Photo: 02/06/2024

Time of Photo: 5:20 PM

Latitude: 36.633831

Longitude: -96.318018

Photographer: Matthew Allen

Description: This was a photo taken from the release point with a view to the ENE showing the overland flowpath which travelled in a general northeast direction, downhill, eventually spilling into an unnamed tributary of Quapaw Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: 36.633831, -96.318018		
City: Pawhuska	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010303

Orientation: SW

Date of Photo: 02/06/2024

Time of Photo: 5:27

Latitude: 36.633963

Longitude: -96.316690

Photographer: Matthew Allen

Description: This was a view looking southwest along the flowpath of pooled crude oil along the bottom of the hill below the release point of the spill. All the fluid in the photo is crude oil. At the time of the inspection, vacuum trucks were working in the area to remove the oil. This was a drainage feature but had no defined bed or bank features.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: 36.633831, -96.318018		
City: Pawhuska	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010304

Orientation: NNE

Date of Photo: 02/06/2024

Time of Photo: 5:28 PM

Latitude: 36.633963

Longitude: -96.316690

Photographer: Matthew Allen

Description: This was a photo taken from the same location as photo No. 4 with a view to the northeast. All fluid in the photo is crude oil but oil staining, which was elevated on the vegetation showed the level of spilled fluids in the area had been reduced. The flowpath in this area ranged from 10 feet to 15 feet in width.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: 36.633831, -96.318018		
City: Pawhuska	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010305

Orientation: WSW

Date of Photo: 02/06/2024

Time of Photo: 5:30 PM

Latitude: 36.635083

Longitude: -96.316214

Photographer: Matthew Allen

Description: This was a temporary containment dam and absorbent booms which had been installed by the operator to prevent further downstream migration of oil and produced water. The pool of fluid in the photo was covered in crude oil. This was the pool where the drainage feature from photos 4 and 5 entered the unnamed tributary of Quapaw Creek. This was the Point of Entry (POE).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: 36.633831, -96.318018		
City: Pawhuska	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010306

Orientation: E

Date of Photo: 02/06/2024

Time of Photo: 5:35 PM

Latitude: 36.635083

Longitude: -96.316214

Photographer: Matthew Allen

Description: This was a photo taken from the same temporary containment dam from photo No. 6. This photo had a view to the east showing the impacted, unnamed tributary of Quapaw Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: 36.633831, -96.318018		
City: Pawhuska	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010308

Orientation: N/A

Date of Photo: 02/06/2024

Time of Photo: 6:11 PM

Latitude: 36.635506

Longitude: -96.313773

Photographer: Matthew Allen

Description: This was an elevated total dissolved solids (TDS) field reading of 21920 mg/L which was taken downstream along the main channel of the impacted tributary. This was taken in a pool of water which had already been emptied once by a vacuum truck, which removed much of the oil, allowing the YSI meter probe to be deployed without the risk of oil contamination.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: 36.633831, -96.318018		
City: Pawhuska	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010309

Orientation: E

Date of Photo: 02/06/2024

Time of Photo: 6:14 PM

Latitude: 36.635506

Longitude: -96.313773

Photographer: Matthew Allen

Description: This was the pool along the main channel of the impacted tributary where the TDS field reading from photo No. 8 was observed. This pool had been emptied by a vacuum truck as part of the ongoing cleanup effort. The pool was covered in "sphag sorb," an industrial oil absorbent, at the time of the inspection.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: 36.633831, -96.318018		
City: Pawhuska	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010311

Orientation: N/A

Date of Photo: 06/02/2024

Time of Photo: 6:21 PM

Latitude: 36.634392

Longitude: -96.309925

Photographer: Matthew Allen

Description: This was an elevated TDS field reading of 6022 mg/L taken at the lowermost temporary containment dam.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: 36.633831, -96.318018		
City: Pawhuska	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010312

Orientation: W

Date of Photo: 02/06/2024

Time of Photo: 6:21 PM

Latitude: 36.634392

Longitude: -96.309925

Photographer: Matthew Allen

Description: This was the lowermost containment dam. The dam was placed where the impacted tributary spilled into and out of a small stock pond. The stock pond had captured the elevated TDS waters. This dam was properly placed and was preventing downstream migration of elevated TDS waters.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: 36.633831, -96.318018		
City: Pawhuska	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010313

Orientation: NE

Date of Photo: 02/06/2024

Time of Photo: 6:22 PM

Latitude: 36.634392

Longitude: -96.309925

Photographer: Matthew Allen

Description: This was the stock pond which was impacted by the spill. At the time of the inspection, this was the end of the observed spill impacts. The containment dam placed at this location was effectively restricting downstream migration of impacted waters.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: 36.633831, -96.318018		
City: Pawhuska	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010314

Orientation: N/A

Date of Photo: 02/06/2024

Time of Photo: 6:26 PM

Latitude: 36.633778

Longitude: -96.309332

Photographer: Matthew Allen

Description: This was a TDS field reading of 124 mg/L taken at the confluence of the impacted tributary and Quapaw Creek. This location was approximately 400 feet downstream from the lowermost containment dam. At the time of the inspection, there was no observable impact to Quapaw Creek. This TDS reading should be used when assessing the “background” TDS level in the area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: 36.633831, -96.318018		
City: Pawhuska	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010315

Orientation: SW

Date of Photo: 02/06/2024

Time of Photo: 6:28 PM

Latitude: 36.633778

Longitude: -96.309332

Photographer: Matthew Allen

Description: This was the confluence of the impacted tributary (entering from the right side of the photo) and Quapaw Creek (entering from the top side of the photo). At the time of the inspection, the temporary containment dam which had been placed approximately 400 feet upstream was preventing impact to Quapaw Creek.