

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	02/01/2024	
Media Program:	Water	
Regulatory Program(s)	Clean Water Act-National Pollution Discharge Elimination System (Brine)	
Company Name:	Parsage Oil Company, LLC	
Facility Name:	Candy Creek Lease	
Facility Physical Location:	Latitude: 36.52597, Longitude: -96.050552	
(city, state, zip code)	Wolco, OK, 74002	
Mailing address:	PO BOX 700037	
(city, state, zip code)	Tulsa, OK, 74170	
County/Parish:		
Facility Phone Number	918-510-6988	
Facility Contact:	Ben Gifford	Co-Owner
	bcgiff@gmail.com	
FRS Number:	n/a	
Identification/Permit Number:	OKU002198	
Media Identifier Number:	n/a	
NAICS:	211111	
SIC:	1311	
Personnel participating in inspection:		
Matthew Allen	EPA/Region 6 ECDW	Inspector
Joe (Dallas) Nave	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 Parsage Oil Company, LLC / Candy Creek Lease (EPA ID No. OKU002198) at 5:00 P.M. on 02/01/2024 to conduct an unannounced inspection. This was an EPA inspection in response to a National Response Center Spill Report (NRC No. 1390574) 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. No company representative was present at the time of the inspection, but a closing conference was held via phone call at the conclusion of the inspection with Ben Gifford representing Parsage Oil Company, LLC. BIA, Osage Agency Field Inspector, Joe (Dallas) Nave 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 Parsage Oil Company, LLC / Candy Creek Lease where a steel injection line failed at two (2) separate locations, releasing produced water onto the ground. The produced water migrated north along a nearby lease road from one release point and south along the same lease road from the other release point until both leaks entered an unnamed tributary of Candy Creek. The NRC Spill Report stated approximately 50 barrels of saltwater was released.

Section II - OBSERVATIONS

I observed the 52 SWD well which was connected to the leaking flowline. See photo No. 1 of Appendix 1 (photo log) which is attached to this report. For additional GPS location information and photo metadata, see the attached photo log.

I observed release point 1, (36.52597, -96.050552), which was a hole in the side of the 2 3/8" steel injection line. I observed oil staining and produced water-soaked soil, leaves and vegetation in the area immediately surrounding the release point. See photo No. 2.

I observed release point 2, (36.526423, -96.050198), which was a hole located on the bottom of the 2 3/8" steel injection line. I observed oil and produced water-stained leaves and vegetation in the area immediately surrounding the release point. I also observed "sphag sorb" and industrial oil absorbent which had been applied to capture the spilled oil. See photo No. 3.

I observed the flowpath down the lease road, and the point of entry (POE) into an unnamed tributary of Candy Creek. At this same location I observed an elevated total dissolved solids (TDS) field reading of 2348 mg/L. Both leaks followed the same gravel lease road, one flowpath from the south and one flowpath from the north to the same POE. Photos No. 4 and 5 show the elevated TDS field reading and POE into the tributary. (POE 36.526138, -96.050360)

Continuing downstream along the impacted tributary, I observed an elevated TDS field reading of 29358 mg/L. This was the highest TDS reading observed during the inspection. See photo No. 6.

At the mouth of the unnamed tributary, I observed an elevated TDS field reading of 21301 mg/L TDS. This reading was observed where the impacted tributary flowed into a secondary channel of Candy Creek. See photos No. 7 and 8.

Working downstream along the secondary channel of Candy Creek, I observed an elevated TDS field reading of 21600 mg/L. At this same location I observed 2 small dead fish approximately 1.5" in length. See photos No. 9 and 10.

I observed an elevated TDS field reading of 6044 mg/L where the secondary channel of Candy Creek flowed into the primary channel of Candy Creek. See photos No. 11 and 12.

I observed a "background" TDS field reading of 162.4 mg/L in the main channel of Candy Creek. See photo No. 13 and 14.

Approximately 200 feet downstream along the main channel of Candy Creek, I observed a TDS field reading of 218.1 mg/L. See photos No. 15 and 16.

I observed no additional spill impacts downstream from the location of photo No. 16.

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

Section III – AREAS OF CONCERN

During the closing conference via phone call with Ben Gifford, I identified the primary areas of concern to be the elevated TDS along the impacted tributary and along Candy Creek as well as the impacted soil and vegetation along the overland flowpath.

Section IV – FOLLOW UP

2/02/2024 – Ben Gifford stated at least 315 barrels of impacted and flush water picked up and sent to disposal.

2/03/2024 – Landowner stated the operator worked full days 2/02/2024 and 02/03/2024 on spill cleanup, including installing catch pit, picking up impacted water and flushing impacted tributary.

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 – 16 photos taken 02/01/2024

Appendix 1

Photograph Log 16 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: 36.52597, -96.050552		
City: Wolco	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010283

Orientation: S

Date of Photo: 02/01/2024

Time of Photo: 5:22 PM

Latitude: 36.525843

Longitude: -96.051045

Photographer: Matthew Allen

Description: This was the disposal well connected to the end of the leaking injection line. The operator, lease name and phone number were inaccurate at the time of the inspection. The well was operated by Parsage Oil Company, LLC and the lease name was Candy Creek Lease.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: 36.52597, -96.050552		
City: Wolco	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010284

Orientation: N/A

Date of Photo: 2/01/2024

Time of Photo: 5:28 PM

Latitude: 36.52597

Longitude: -96.050552

Photographer: Matthew Allen

Description: This was the release point located furthest south, which was closest to the disposal well. The hole was located on the right side of the steel pipe, centered in the picture frame. Fluid from this leak migrated north along the lease road (approximately 75 feet) before entering into the unnamed tributary of Candy Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: 36.52597, -96.050552		
City: Wolco	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010285

Orientation: N/A

Date of Photo:

Time of Photo: 02/01/2024

Latitude: 36.526423

Longitude: -96.050198

Photographer: Matthew Allen

Description: This was the location of the second leak on the same injection line. The hole was located on the underneath side of the line, 6"-8" to the left of the pipe collar. Fluid from this hole migrated south along the lease road, approximately 75 feet before entering the unnamed tributary of Candy Creek.

Description: This was an elevated total dissolved solids (TDS) field reading of 2348 mg/L observed at the point of entry (POE), where both spills entered into the unnamed tributary of Candy Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: 36.52597, -96.050552		
City: Wolco	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010287

Orientation: SSE

Date of Photo: 02/01/2024

Time of Photo: 5:33 PM

Latitude: 36.526138

Longitude: -96.050360

Photographer: Matthew Allen

Description: This was the POE where both flow paths entered the unnamed tributary of Candy Creek. This photo was taken while standing on the lease road with a view to the southeast/downstream.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: 36.52597, -96.050552		
City: Wolco	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010288

Orientation: N/A

Date of Photo: 02/01/2024

Time of Photo: 5:35 PM

Latitude: 36.526162

Longitude: -96.050113

Photographer: Matthew Allen

Description: This was an elevated TDS field reading of 29358 mg/L, observed in the main channel of the impacted tributary, downstream from the POE. This was the highest TDS level observed during the inspection. This was located approximately 100 feet downstream from the POE.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: 36.52597, -96.050552		
City: Wolco	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010289

Orientation: N/A

Date of Photo: 02/01/2024

Time of Photo: 5:41 PM

Latitude: 36.526721

Longitude: -96.049574

Photographer: Matthew Allen

Description: This was an elevated TDS field reading of 21301 mg/L taken at the confluence of the unnamed tributary and a side channel of Candy Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: 36.52597, -96.050552		
City: Wolco	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010290

Orientation: NE

Date of Photo: 02/01/2024

Time of Photo: 5:43 PM

Latitude: 36.526721

Longitude: -96.049574

Photographer: Matthew Allen

Description: This was the location where the TDS field reading from photo No. 7 was observed. This was the mouth of the unnamed tributary as it flowed into the secondary channel of Candy Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: 36.52597, -96.050552		
City: Wolco	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010291

Orientation: N/A

Date of Photo: 02/01/2024

Time of Photo: 5:45 PM

Latitude: 36.526724

Longitude: -96.049348

Photographer: Matthew Allen

Description: This was an elevated TDS field reading of 21600 observed in the secondary channel of Candy Creek. At the time of the inspection this channel was flowing and connected to the main channel of Candy Creek. I observed 2 small dead fish floating at this location, approximately 1.5" in length.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: 36.52597, -96.050552		
City: Wolco	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010299

Orientation: N/A

Date of Photo: 02/01/2024

Time of Photo: 6:03 PM

Latitude: 36.526724

Longitude: -96.049348

Photographer: Matthew Allen

Description: This was the 2 small dead fish which were located at the same location as photo No. 9. The fish were approximately 1.5" in length.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: 36.52597, -96.050552		
City: Wolco	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010292

Orientation: N/A

Date of Photo: 02/01/2024

Time of Photo: 5:48 PM

Latitude: 36.526717

Longitude: -96.048478

Photographer: Matthew Allen

Description: This was an elevated TDS field reading of 6044 mg/L taken at the point where the secondary channel of Candy Creek flowed into the primary channel of Candy Creek. This reading was observed in a significant pool of water along the main channel of Candy Creek. See photo No. 12.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: 36.52597, -96.050552		
City: Wolco	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010293

Orientation: E

Date of Photo: 02/01/2024

Time of Photo: 5:49 PM

Latitude: 36.526717

Longitude: -96.048478

Photographer: Matthew Allen

Description: This was the location where the elevated TDS field reading from photo No. 11 was taken. This photo is taken with a view to the east/downstream along the primary channel of Candy Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: 36.52597, -96.050552		
City: Wolco	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010294

Orientation: N/A

Date of Photo: 02/01/2024

Time of Photo: 5:51 PM

Latitude: 36.526793

Longitude: -96.048456

Photographer: Matthew Allen

Description: This was a TDS field reading of 162.4 mg/L taken in the main channel of Candy Creek, west/upstream from the impacted section of Candy Creek. This reading should be used when establishing background TDS levels for the area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: 36.52597, -96.050552		
City: Wolco	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010295

Orientation: SE

Date of Photo: 02/01/2024

Time of Photo: 5:52 PM

Latitude: 36.526793

Longitude: -96.048456

Photographer: Matthew Allen

Description: This photo was taken at the same location as the “background” TDS observation from photo No. 13. This photo was taken while standing on the south edge of the main channel of Candy Creek with a view to the southeast. This photo was taken upstream from the point where the secondary channel carrying elevated TDS waters from the spill enters the primary channel of Candy Creek. The impacted channel enters from the right-hand side of this photo.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: 36.52597, -96.050552		
City: Wolco	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010297

Orientation: N/A

Date of Photo: 02/01/2024

Time of Photo: 5:56 PM

Latitude: 36.526256

Longitude: -96.047806

Photographer: Matthew Allen

Description: This was a TDS field reading of 218.1 mg/L taken approximately 200 feet downstream along the primary channel of Candy Creek. At the time of the inspection there was significant in-stream flow along Candy Creek due to recent rainfall.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: 36.52597, -96.050552		
City: Wolco	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010298

Orientation: N/A

Date of Photo: 02/01/2024

Time of Photo: 5:56 PM

Latitude: 36.526256

Longitude: -96.047806

Photographer: Matthew Allen

Description: This was the location of the TDS reading from photo No. 16. This was a view looking east along the main channel of Candy Creek.