

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	10/07/2024	
Media Program:	Water	
Regulatory Program(s)	Clean Water Act	
Company Name:	Corley Trust, LLC	
Facility Name:	Wilson #7 SWD Tank Battery	
Facility Physical Location:	Latitude: 33.35372, Longitude: -92.69236	
(city, state, zip code)	Smackover, AR, 71762	
Mailing address:	410 W. 6 th	
(city, state, zip code)	Smackover, AR 71762	
County/Parish:	Union County	
Facility Phone Number	870-725-3928	
Facility Contact:	Jeff Corley corleytrust@att.net	
FRS Number:	NA	
Identification/Permit Number:	ARU002260	
Media Identifier Number:	NA	
NAICS:	211111	
SIC:	1311	
Personnel participating in inspection:		
Uma Lad (lead)	EPA/Region 6 ECDW	Enforcement Officer/Inspector
Kerri McCabe	EPA/Region 6 ECDW	Enforcement Officer/Inspector
Michael Blaha	EPA/Region 6 ECDW	Enforcement Officer/Inspector
EPA Lead Inspector Signature/Date		
	Uma Lad	Date
Supervisor Signature/Date		
	Jeanne Eckhart	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Michael Blaha, Kerri McCabe, and I, Uma Lad, arrived at Corley Trust, LLC – Wilson #7 SWD Tank Battery, located off a lease road near Gas Plant Road (33.353727, -92.69236) at 5:55 PM on October 7, 2024, for an unannounced inspection. No facility representatives were present 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 an inspection on the Corley Trust, LLC – Wilson #7 SWD Tank Battery, which consists of two (2) saltwater storage tanks, two (2) crude oil storage tanks, two (2) separators, and one (1) saltwater disposal (SWD) well.

Section II - OBSERVATIONS

I observed the facility sign, secondary containment, pipes, valves, and storage tanks located at the facility; see Appendix 1 (photo log), photo No. 1 and No. 2. For additional GPS location and photo metadata, see Appendix 1.

I observed loose oil and brine in a workover pit that was outside of secondary containment, see photo No. 3-4. The pit was constructed around the secondary containment discharge valve.

I observed loose oil inside secondary containment, see photo No. 5.

I observed an overhead pipe from a tank that was not properly supported, see photo No. 6.

I observed discharge valves with loose oil and no catchment, see photo No. 7. I also observed a leaking connector pipe for the SWD well, see photo No. 8.

I observed tanks without “out of service” labels, see photo No. 9.

Section III – AREAS OF CONCERN

No closing conference was held due to no Corley Trust, LLC staff being present during the inspection. Areas of concern at the time of the inspection include the loose oil and brine in the workover pit outside of secondary containment, loose oil within secondary containment, a tank pipe without proper support, discharge valves with loose oil and no catchment, a leak at a connector pipe for the SWD well, and tanks without the “out of service” markings.

Section IV – FOLLOW UP

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

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 9 photos taken on 10/07/2024

Appendix 1

Photograph Log

9 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: 33.35372, - 92.69236		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA070019

Orientation: N

Date of Photo: 10/07/2024

Time of Photo: 5:55 PM

Latitude: 33.35372

Longitude: - 92.69236

Photographer: Uma Lad

Description: This photo was taken looking north and shows the facility sign.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: 33.35372, - 92.69236		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA070020

Orientation: N

Date of Photo: 10/07/2024

Time of Photo: 5:56 PM

Latitude: 33.35371

Longitude: -92.69253

Photographer: Uma Lad

Description: This photo was taken looking north and shows an overview of the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: 33.35372, - 92.69236		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA070021

Orientation: N

Date of Photo: 10/07/2024

Time of Photo: 5:57 PM

Latitude: 33.35394

Longitude: -92.69245

Photographer: Uma Lad

Description: This photo was taken looking north and shows a workover pit with loose oil and brine outside of secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: 33.35372, - 92.69236		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA070022

Orientation: N

Date of Photo: 10/07/2024

Time of Photo: 5:58 PM

Latitude: 33.35395

Longitude: - 92.69248

Photographer: Uma Lad

Description: T This photo was taken looking north and shows a workover pit with loose oil and brine outside of secondary containment. The berm is built around the secondary containment discharge valve.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: 33.35372, - 92.69236		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA070023

Orientation: SW

Date of Photo: 10/07/2024

Time of Photo: 5:58 PM

Latitude: 33.35395

Longitude: -92.69248

Photographer: Uma Lad

Description: This photo was taken looking southwest and shows loose oil inside secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: 33.35372, - 92.69236		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA070024

Orientation: SW

Date of Photo: 10/07/2024

Time of Photo: 5:58 PM

Latitude: 33.35396

Longitude: -92.69246

Photographer: Uma Lad

Description: This photo was taken looking southwest and shows an overhead pipe without support extending from a tank.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: 33.35372, - 92.69236		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA070025

Orientation: SW

Date of Photo: 10/07/2024

Time of Photo: 6:00 PM

Latitude: 33.35394

Longitude: -92.69237

Photographer: Uma Lad

Description: This photo was taken looking southwest and shows discharge valves with loose oil and no catchment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: 33.35372, - 92.69236		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA070026

Orientation: SW

Date of Photo: 10/07/2024

Time of Photo: 6:00 PM

Latitude: 33.35392

Longitude: -92.69226

Photographer: Uma Lad

Description: This photo was taken looking southwest and shows a leak from a connection pipe to the SWD well , where crystal formation was present.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: 33.35372, - 92.69236		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: PA070028

Orientation: SW

Date of Photo: 10/07/2024

Time of Photo: 6:01 PM

Latitude: 33.35411

Longitude: -92.69265

Photographer: Uma Lad

Description: This photo was taken looking southwest and shows two (2) tanks without "out of service" labels or markings.