

## Region 6 - Enforcement & Compliance Assurance Division

### INSPECTION REPORT

|                                        |                                                                                                                                  |                                  |
|----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|----------------------------------|
| Inspection Date:                       | 01/14/2026                                                                                                                       |                                  |
| Media Program:                         | Water (CWA)                                                                                                                      |                                  |
| Regulatory Program:                    | Water (CWA) Brine Program (Oil & Gas inspection)                                                                                 |                                  |
| Company Name:                          | Nevada Oil, LLC                                                                                                                  |                                  |
| Facility Name:                         | Irma Nacatoch (Sand) Unit 28 Tank Battery                                                                                        |                                  |
| Facility Physical Location:            | From Willisville, State Highway 371 North, right on Hwy 76, and then right onto an oilfield lease road at 33.545952, -93.218989. |                                  |
| (city, state, zip code)                | Willisville, AR 71730                                                                                                            |                                  |
| Mailing address:                       | 451 North Washington                                                                                                             |                                  |
| (city, state, zip code)                | El Dorado, AR 71864                                                                                                              |                                  |
| County/Parish:                         | Nevada County                                                                                                                    |                                  |
| Facility Phone Number                  | 870-862-9950                                                                                                                     |                                  |
| Facility Contact:                      | Michael L. Burns<br>(870-310-1501)<br>hrowan@ecgcpa.com                                                                          | Person Responsible for Operation |
| FRS Number:                            | N/A                                                                                                                              |                                  |
| Identification/Permit Number:          | ARU002289                                                                                                                        |                                  |
| Media Identifier Number:               | N/A                                                                                                                              |                                  |
| NAICS:                                 | 211111                                                                                                                           |                                  |
| SIC:                                   | 1311                                                                                                                             |                                  |
| Personnel participating in inspection: |                                                                                                                                  |                                  |
| Kerri McCabe (lead)                    | EPA / Region 6 ECDW                                                                                                              | Inspector / Enforcement Officer  |
| Uma Lad                                | EPA / Region 6 ECDW                                                                                                              | Inspector / Enforcement Officer  |
| Tom McKay                              | EPA / Region 6 SEMD                                                                                                              | SEE Inspector                    |
| Michael Burns                          | Nevada Oil, LLC                                                                                                                  | Operations                       |
| Dollar Burns                           | Nevada Oil, LLC                                                                                                                  | Companion                        |
|                                        |                                                                                                                                  |                                  |
| EPA Lead Inspector<br>Signature/Date   |                                                                                                                                  |                                  |
|                                        | Kerri McCabe                                                                                                                     | Date                             |
| Supervisor<br>Signature/Date           |                                                                                                                                  |                                  |
|                                        | Jeanne Eckhart                                                                                                                   | Date                             |

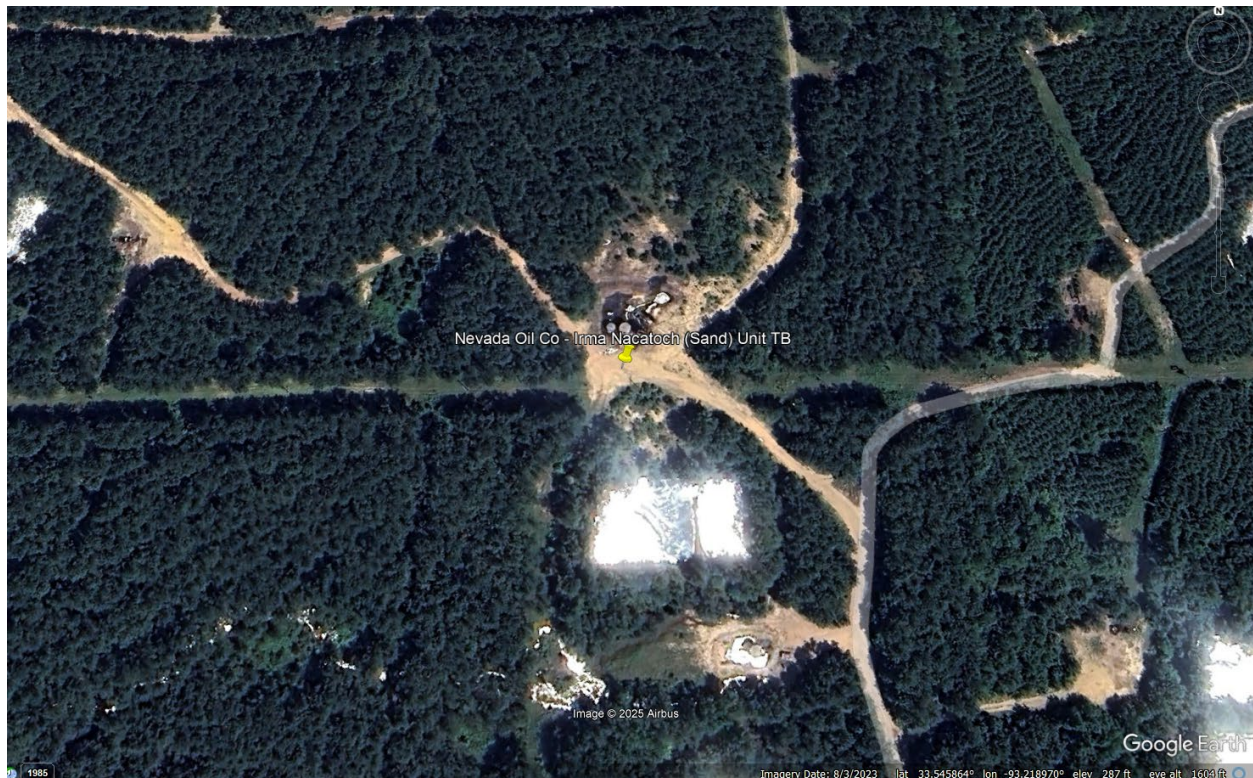
## Section I – INTRODUCTION

### PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Kerri McCabe (lead), Uma Lad, and Tom McKay (for Spill Prevention Control and Countermeasure (SPCC) inspection) arrived at the Nevada Oil, LLC / Irma Nacatoch (Sand) Unit 28 Tank Battery (“facility”) located from State Highway 371 North, right on Hwy 76, and then right onto an oilfield lease road at 33.545952, -93.218989 in Willisville, Nevada County, Arkansas; at 0845 on 01/14/2026 for an announced inspection. Mr. Michael Burns 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. This facility was last inspected by Inspector Kerri McCabe on 03/05/2025 under the Brine Program.

### FACILITY DESCRIPTION

EPA conducted an inspection on the Nevada Oil, LLC / Irma Nacatoch (Sand) Unit 28 Tank Battery facility, which contains two (2) tanks for crude oil and saltwater storage, one (1) treater, one (1) separator, and one (1) open-top tank for oil skimming.



**Map 1.** Aerial imagery (Google Earth dated 08/03/2023) of the Nevada Oil, LLC / Irma Nacatoch (Sand) Unit 28 Tank Battery facility.

## **Section II - OBSERVATIONS**

I observed the facility signage, tank battery, pipes and valves, storage tanks, and separators/treaters; see Appendix 1 (Photographs Log), see Photos No. 1 and No. 2. For additional GPS location and photo metadata, see Appendix 1.

I observed the load line with a catchment bucket for secondary containment, see Photo No. 3.

I observed a tank plated (i.e., with the manway removed) in preparation for permanent closure with “out of service” tagging, see Photos No. 4 and No. 5.

I observed the sump channel and pit with loose oil inside secondary containment, see Photos No. 6 and No. 7.

I observed active oil leaks from valves/couplings inside secondary containment, see Photos No. 8 through No. 10 and No. 13.

I observed an open-top skimming tank with gapping between the tank and battery surface, see Photos No. 11 and No. 12.

## **Section III – AREAS OF CONCERN**

EPA Region 6 inspectors Kerri McCabe, Uma Lad, and Tom McKay held a closing conference with Mr. Michael Burns with Nevada Oil, LLC after the inspection. Areas of concern under the SPCC rule at the time of the inspection include the following:

- Loose oil and saltwater inside secondary containment, 40 CFR 112.9(b)(1) (Photos No. 6 and No. 7), and
- Active leaks of oil from valves/couplings inside secondary containment, 40 CFR 122.9(d)(1) (Photos No. 8 through No. 10 and No. 13).

## **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. SEE Inspector Tom McKay will address SPCC rule concerns.

## **Section V – LIST OF APPENDICES**

Appendix 1 – Photograph Log – 13 photos taken on 01/14/2026.

## Appendix 1

### Photograph Log

13 Photos

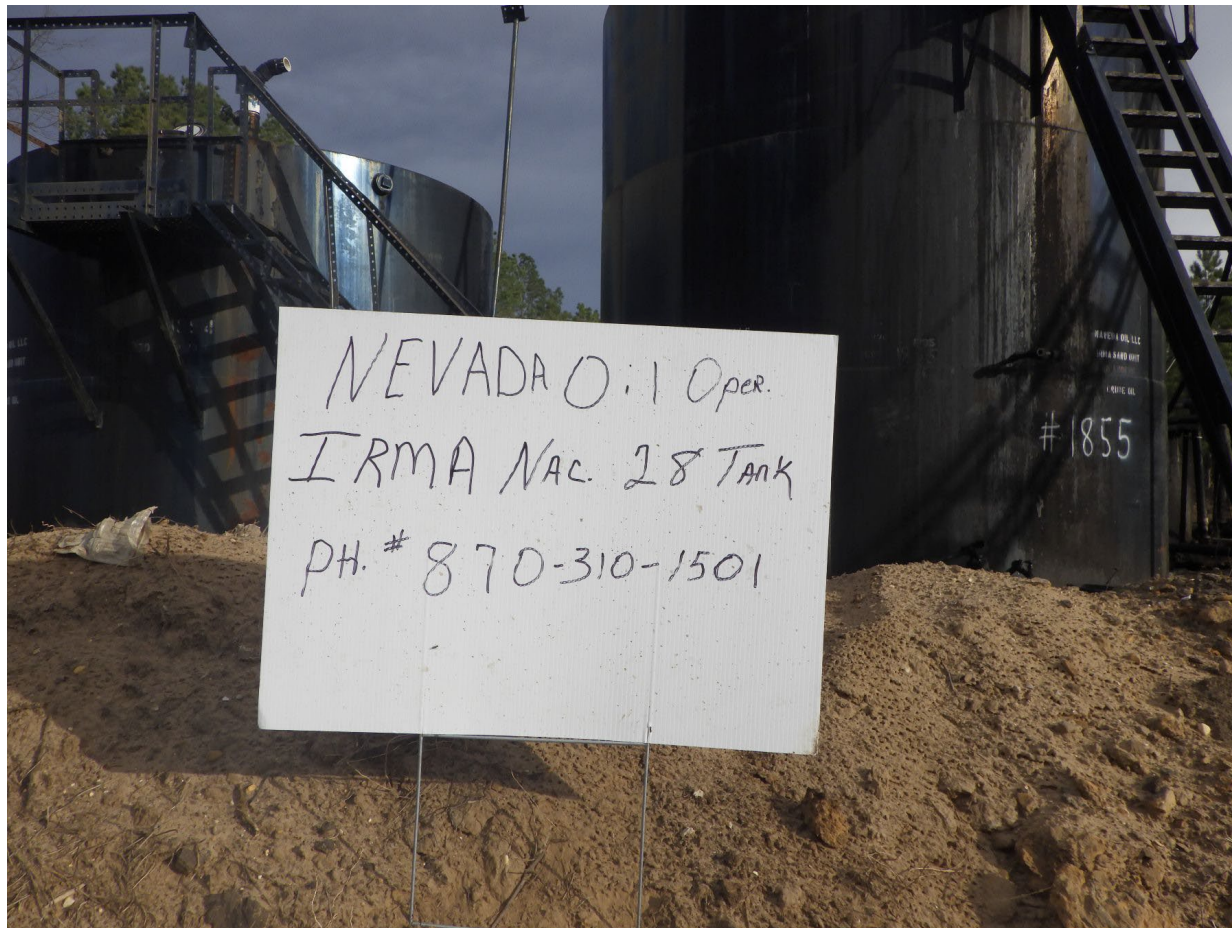


## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## Photograph Log

Photo No. 1

|                    |                                                    |             |               |               |           |            |    |
|--------------------|----------------------------------------------------|-------------|---------------|---------------|-----------|------------|----|
| Facility/Location: | Nevada Oil, LLC Irma Nacatoch Unit Tank Battery 28 |             |               |               |           |            |    |
| City:              | Willisville                                        | County:     | Nevada County | State:        | AR        | Direction: | SW |
| Filename:          | R0011271.JPG                                       | Photo Date: | 01/14/2026    | Time:         | 09:04:44  |            |    |
| Photographer:      | Kerri McCabe                                       |             |               | Witness Name: | Tom McKay |            |    |



|              |                                                                                                  |            |                |
|--------------|--------------------------------------------------------------------------------------------------|------------|----------------|
| Description: | Looking SW, this photo shows the signage at the Irma Nacatoch Unit 28 Tank Battery ("facility"). |            |                |
| Latitude:    | 33°32'45.636" N                                                                                  | Longitude: | 93°13'8.358" W |



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## Photograph Log

Photo No. 2

|                    |              |                                                    |               |               |    |            |          |  |
|--------------------|--------------|----------------------------------------------------|---------------|---------------|----|------------|----------|--|
| Facility/Location: |              | Nevada Oil, LLC Irma Nacatoch Unit Tank Battery 28 |               |               |    |            |          |  |
| City:              | Willisville  | County:                                            | Nevada County | State:        | AR | Direction: | SW       |  |
| Filename:          | R0011272.JPG | Photo Date:                                        |               | 01/14/2026    |    | Time:      | 09:05:13 |  |
| Photographer:      | Kerri McCabe |                                                    |               | Witness Name: |    | Tom McKay  |          |  |



|              |                                                           |            |                |
|--------------|-----------------------------------------------------------|------------|----------------|
| Description: | Looking SW, this photo shows an overview of the facility. |            |                |
| Latitude:    | 33°32'45.402" N                                           | Longitude: | 93°13'8.094" W |



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## Photograph Log

Photo No. 3

|                    |              |                                                    |               |               |    |            |          |  |
|--------------------|--------------|----------------------------------------------------|---------------|---------------|----|------------|----------|--|
| Facility/Location: |              | Nevada Oil, LLC Irma Nacatoch Unit Tank Battery 28 |               |               |    |            |          |  |
| City:              | Willisville  | County:                                            | Nevada County | State:        | AR | Direction: | SW       |  |
| Filename:          | R0011273.JPG | Photo Date:                                        |               | 01/14/2026    |    | Time:      | 09:08:08 |  |
| Photographer:      | Kerri McCabe |                                                    |               | Witness Name: |    | Tom McKay  |          |  |



|              |                                                                                                       |            |               |
|--------------|-------------------------------------------------------------------------------------------------------|------------|---------------|
| Description: | Looking SW, this photo shows the transfer line for the tank battery with a catchment bucket in place. |            |               |
| Latitude:    | 33°32'45.954" N                                                                                       | Longitude: | 93°13'8.52" W |



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## Photograph Log

Photo No. 4

|                    |              |                                                    |               |               |    |            |          |  |
|--------------------|--------------|----------------------------------------------------|---------------|---------------|----|------------|----------|--|
| Facility/Location: |              | Nevada Oil, LLC Irma Nacatoch Unit Tank Battery 28 |               |               |    |            |          |  |
| City:              | Willisville  | County:                                            | Nevada County | State:        | AR | Direction: | SW       |  |
| Filename:          | R0011274.JPG | Photo Date:                                        |               | 01/14/2026    |    | Time:      | 09:06:31 |  |
| Photographer:      | Kerri McCabe |                                                    |               | Witness Name: |    | Tom McKay  |          |  |



|              |                                                                                                                  |            |                |
|--------------|------------------------------------------------------------------------------------------------------------------|------------|----------------|
| Description: | Looking SW, this photo shows a tank that has been labeled "not in service" in preparation for permanent closure. |            |                |
| Latitude:    | 33°32'45.396" N                                                                                                  | Longitude: | 93°13'8.436" W |



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## Photograph Log

Photo No. 5

|                    |              |                                                    |               |               |    |            |          |  |
|--------------------|--------------|----------------------------------------------------|---------------|---------------|----|------------|----------|--|
| Facility/Location: |              | Nevada Oil, LLC Irma Nacatoch Unit Tank Battery 28 |               |               |    |            |          |  |
| City:              | Willisville  | County:                                            | Nevada County | State:        | AR | Direction: | SSW      |  |
| Filename:          | R0011275.JPG | Photo Date:                                        |               | 01/14/2026    |    | Time:      | 09:13:49 |  |
| Photographer:      | Kerri McCabe |                                                    |               | Witness Name: |    | Tom McKay  |          |  |



|              |                                                                                                                                                           |            |                |
|--------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------|
| Description: | Looking SSW, this photo shows the same tank from Photo No. 4 that Nevada Oil, LLC plated (i.e., removed the manway) in preparation for permanent closure. |            |                |
| Latitude:    | 33°32'46.206" N                                                                                                                                           | Longitude: | 93°13'8.418" W |



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## Photograph Log

Photo No. 6

|                    |              |                                                    |               |               |    |            |          |  |
|--------------------|--------------|----------------------------------------------------|---------------|---------------|----|------------|----------|--|
| Facility/Location: |              | Nevada Oil, LLC Irma Nacatoch Unit Tank Battery 28 |               |               |    |            |          |  |
| City:              | Willisville  | County:                                            | Nevada County | State:        | AR | Direction: | S        |  |
| Filename:          | R0011276.JPG | Photo Date:                                        |               | 01/14/2026    |    | Time:      | 09:08:40 |  |
| Photographer:      | Kerri McCabe |                                                    |               | Witness Name: |    | Tom McKay  |          |  |



|              |                                                                                                     |            |                |
|--------------|-----------------------------------------------------------------------------------------------------|------------|----------------|
| Description: | Looking S, this photo shows the sump system for the facility and loose oil inside the tank battery. |            |                |
| Latitude:    | 33°32'46.062" N                                                                                     | Longitude: | 93°13'8.688" W |



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## Photograph Log

Photo No. 7

|                    |              |                                                    |               |               |    |            |          |  |
|--------------------|--------------|----------------------------------------------------|---------------|---------------|----|------------|----------|--|
| Facility/Location: |              | Nevada Oil, LLC Irma Nacatoch Unit Tank Battery 28 |               |               |    |            |          |  |
| City:              | Willisville  | County:                                            | Nevada County | State:        | AR | Direction: | SW       |  |
| Filename:          | R0011279.JPG | Photo Date:                                        |               | 01/14/2026    |    | Time:      | 09:18:20 |  |
| Photographer:      | Kerri McCabe |                                                    |               | Witness Name: |    | Tom McKay  |          |  |



|              |                                                                                             |            |                |
|--------------|---------------------------------------------------------------------------------------------|------------|----------------|
| Description: | Looking SW, this photo shows a close-up view of the sump area with sump pump and loose oil. |            |                |
| Latitude:    | 33°32'45.774" N                                                                             | Longitude: | 93°13'8.238" W |



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## Photograph Log

Photo No. 8

|                    |              |                                                    |                  |               |    |            |          |  |
|--------------------|--------------|----------------------------------------------------|------------------|---------------|----|------------|----------|--|
| Facility/Location: |              | Nevada Oil, LLC Irma Nacatoch Unit Tank Battery 28 |                  |               |    |            |          |  |
| City:              | Willisville  | County:                                            | Nevada<br>County | State:        | AR | Direction: | SW       |  |
| Filename:          | R0011280.JPG | Photo Date:                                        |                  | 01/14/2026    |    | Time:      | 09:15:02 |  |
| Photographer:      | Kerri McCabe |                                                    |                  | Witness Name: |    | Tom McKay  |          |  |



|              |                                                                               |            |                |
|--------------|-------------------------------------------------------------------------------|------------|----------------|
| Description: | Looking SW, this photo shows active leaks from valves at an oil storage tank. |            |                |
| Latitude:    | 33°32'46.266" N                                                               | Longitude: | 93°13'7.572" W |



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## Photograph Log

Photo No. 9

|                    |              |                                                    |               |               |    |            |          |  |
|--------------------|--------------|----------------------------------------------------|---------------|---------------|----|------------|----------|--|
| Facility/Location: |              | Nevada Oil, LLC Irma Nacatoch Unit Tank Battery 28 |               |               |    |            |          |  |
| City:              | Willisville  | County:                                            | Nevada County | State:        | AR | Direction: | SW       |  |
| Filename:          | R0011281.JPG | Photo Date:                                        |               | 01/14/2026    |    | Time:      | 09:21:20 |  |
| Photographer:      | Kerri McCabe |                                                    |               | Witness Name: |    | Tom McKay  |          |  |



|              |                                                                                                       |            |                |
|--------------|-------------------------------------------------------------------------------------------------------|------------|----------------|
| Description: | Looking SW, this photo shows an additional active leak from a valve for one of the oil storage tanks. |            |                |
| Latitude:    | 33°32'45.858" N                                                                                       | Longitude: | 93°13'8.304" W |



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## Photograph Log

Photo No. 10

|                    |              |                                                    |                  |               |    |            |          |  |
|--------------------|--------------|----------------------------------------------------|------------------|---------------|----|------------|----------|--|
| Facility/Location: |              | Nevada Oil, LLC Irma Nacatoch Unit Tank Battery 28 |                  |               |    |            |          |  |
| City:              | Willisville  | County:                                            | Nevada<br>County | State:        | AR | Direction: | S        |  |
| Filename:          | R0011282.JPG | Photo Date:                                        |                  | 01/14/2026    |    | Time:      | 09:17:04 |  |
| Photographer:      | Kerri McCabe |                                                    |                  | Witness Name: |    | Tom McKay  |          |  |



|              |                                                                                           |            |               |
|--------------|-------------------------------------------------------------------------------------------|------------|---------------|
| Description: | Looking S, this photo shows an active leak from a valve for one of the oil storage tanks. |            |               |
| Latitude:    | 33°32'45.846" N                                                                           | Longitude: | 93°13'8.01" W |



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## Photograph Log

Photo No. 11

|                    |              |                                                    |               |               |    |            |          |  |
|--------------------|--------------|----------------------------------------------------|---------------|---------------|----|------------|----------|--|
| Facility/Location: |              | Nevada Oil, LLC Irma Nacatoch Unit Tank Battery 28 |               |               |    |            |          |  |
| City:              | Willisville  | County:                                            | Nevada County | State:        | AR | Direction: | SSW      |  |
| Filename:          | R0011283.JPG | Photo Date:                                        |               | 01/14/2026    |    | Time:      | 09:23:26 |  |
| Photographer:      | Kerri McCabe |                                                    |               | Witness Name: |    | Tom McKay  |          |  |



|              |                                                                                                 |            |               |
|--------------|-------------------------------------------------------------------------------------------------|------------|---------------|
| Description: | Looking SSW, this photo shows an open-topped skimming tank for additional oil/water separation. |            |               |
| Latitude:    | 33°32'45.972" N                                                                                 | Longitude: | 93°13'8.07" W |



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## Photograph Log

Photo No. 12

|                    |              |                                                    |                  |               |    |            |          |  |
|--------------------|--------------|----------------------------------------------------|------------------|---------------|----|------------|----------|--|
| Facility/Location: |              | Nevada Oil, LLC Irma Nacatoch Unit Tank Battery 28 |                  |               |    |            |          |  |
| City:              | Willisville  | County:                                            | Nevada<br>County | State:        | AR | Direction: | SSW      |  |
| Filename:          | R0011284.JPG | Photo Date:                                        |                  | 01/14/2026    |    | Time:      | 09:19:14 |  |
| Photographer:      | Kerri McCabe |                                                    |                  | Witness Name: |    | Tom McKay  |          |  |



|              |                                                                    |            |                |
|--------------|--------------------------------------------------------------------|------------|----------------|
| Description: | Looking SSW, this photo shows a gap between a tank and the ground. |            |                |
| Latitude:    | 33°32'45.846" N                                                    | Longitude: | 93°13'8.346" W |



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## Photograph Log

Photo No. 13

|                    |              |                                                    |               |               |    |            |          |  |
|--------------------|--------------|----------------------------------------------------|---------------|---------------|----|------------|----------|--|
| Facility/Location: |              | Nevada Oil, LLC Irma Nacatoch Unit Tank Battery 28 |               |               |    |            |          |  |
| City:              | Willisville  | County:                                            | Nevada County | State:        | AR | Direction: | S        |  |
| Filename:          | R0011285.JPG | Photo Date:                                        |               | 01/14/2026    |    | Time:      | 09:21:28 |  |
| Photographer:      | Kerri McCabe |                                                    |               | Witness Name: |    | Tom McKay  |          |  |



|              |                                                                                           |            |               |
|--------------|-------------------------------------------------------------------------------------------|------------|---------------|
| Description: | Looking S, this photo shows an active leak from a valve for one of the oil storage tanks. |            |               |
| Latitude:    | 33°32'45.846" N                                                                           | Longitude: | 93°13'8.31" W |