

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	03/05/2025	
Media Program:	Water (CWA)	
Regulatory Program(s)	Water (CWA) Brine Program (Oil & Gas inspection)	
Company Name:	W M Operating, Inc.	
Facility Name:	HGC Lewis-Denman Tank Battery	
Facility Physical Location:	From Willisville, State Highway 371 North, right on Hwy 76, right on Nevada Rd 161, and then right onto an oilfield lease road at 33.535379, -93.270251.	
(city, state, zip code)	Willisville, AR 71730	
Mailing address:	151 Curry Field Rd	
(city, state, zip code)	Stephens, AR 71764	
County/Parish:	Nevada County	
Facility Phone Number	870-947-0415	
Facility Contact:	Kelly Lamkin (870-947-0415) kellylamkin@gmail.com	Person Responsible for Operation
FRS Number:	N/A	
Identification/Permit Number:	ARU002291	
Media Identifier Number:	N/A	
NAICS:	211111	
SIC:	1311	
Personnel participating in inspection:		
Kerri McCabe (lead)	EPA / Region 6 ECDW	Inspector / Enforcement Officer
Michael Blaha	EPA / Region 6 ECDW	Inspector / Enforcement Officer
EPA Lead Inspector Signature/Date		
	Kerri McCabe	Date
Supervisor Signature/Date		
	Jeanne Eckhart	Date

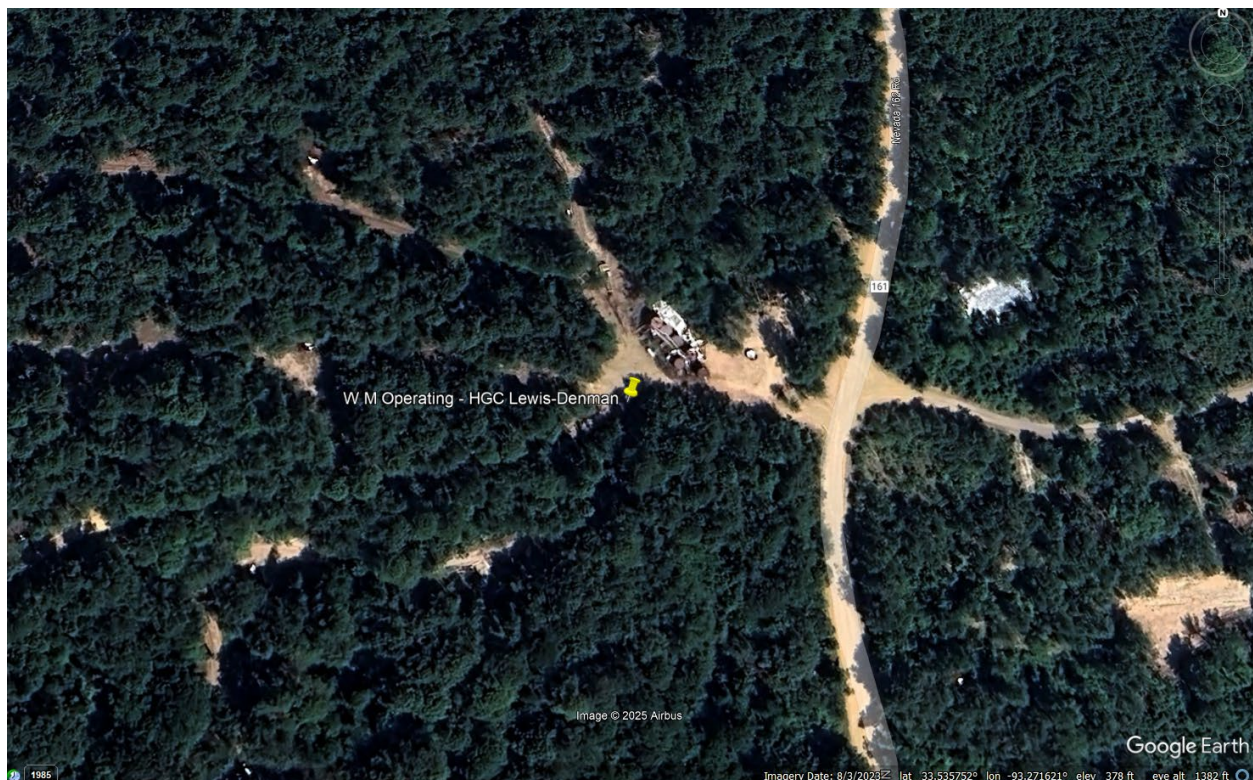
Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Kerri McCabe (lead) and Michael Blaha arrived at the W M Operating, Inc. / HGC Lewis-Denman Tank Battery (“facility”) located from State Highway 371 North, right on Hwy 76, right on Nevada Rd 161, and then right onto an oilfield lease road at 33.535379, -93.270251 in Willisville, Nevada County, Arkansas; at 1345 on 03/05/2025 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 W M Operating, Inc. / HGC Lewis-Denman Tank Battery facility, which contains four (4) tanks for crude oil and saltwater storage, two (2) separators/treaters, and one (1) open-top tank for crude oil separation/skimming.



Map 1. Aerial imagery (Google Earth dated 08/03/2023) of the W M Operating, Inc. / HGC Lewis-Denman Tank Battery facility.

Section II - OBSERVATIONS

I observed the facility signage, secondary containment, pipes and valves, storage tanks, and separators/treaters; see Appendix 1 (Photographs Log), Photos No. 1 through No. 3. For additional GPS location and photo metadata, see Appendix 1.

I observed product transfer lines outside secondary containment without catchment buckets, see Photos No. 2 and No. 3.

I observed a bucket containing crude oil on the berm of the secondary containment, see Photos No. 2 through No. 4.

I observed a pipe with a replaced cap and a new motor/pump inside secondary containment, see Photos No. 5 and No. 6.

I observed an open-top tank in the sump area of the secondary containment, see Photos No. 7 and No. 9.

I observed the drainpipe for the secondary containment, see Photo No. 8.

I observed loose crude oil and saltwater inside secondary containment, see Photos No. 5 through No. 7 and Photos No. 9 through No. 11.

Section III – AREAS OF CONCERN

No closing conference was held due to no personnel with W M Operating, Inc. being present during the inspection. Areas of concern at the time of the inspection include the following:

- Product transfer lines outside secondary containment without catchment buckets (Photos No. 2 and No. 3),
- A bucket containing crude oil on the berm of the secondary containment (Photos No. 2 and No. 4),
- Loose crude oil and saltwater inside secondary containment (Photos No. 5 through No. 7 and Photos No. 9 through No. 11).

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.

Section V – LIST OF APPENDICES

Appendix 1 – Photograph Log – 11 photos taken 03/05/2025.

Appendix 1

Photograph Log 11 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: From Willisville (Irma Community), State Hwy 371, right on Hwy 76, then right on Nevada Rd 162, right onto an oilfield lease road at 33.535379, -93.270251.

City: Willisville (Irma)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0748

Orientation: 61° ENE

Date of Photo: 03/05/2025

Time of Photo: 1349

Latitude: 33.535567

Longitude: -93.270217

Photographer: Kerri McCabe

Description: Looking ENE, this photo shows the signage at the HGC Lewis-Denman Tank Battery ("facility").



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: From Willisville (Irma Community), State Hwy 371, right on Hwy 76, then right on Nevada Rd 162, right onto an oilfield lease road at 33.535379, -93.270251.

City: Willisville (Irma)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0749

Orientation: 69° ENE

Date of Photo: 03/05/2025

Time of Photo: 1349

Latitude: 33.535483

Longitude: -93.270250

Photographer: Kerri McCabe

Description: Looking ENE, this photo shows an overview of the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: From Willisville (Irma Community), State Hwy 371, right on Hwy 76, then right on Nevada Rd 162, right onto an oilfield lease road at 33.535379, -93.270251.

City: Willisville (Irma)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0750

Orientation: 107° ESE

Date of Photo: 03/05/2025

Time of Photo: 1350

Latitude: 33.535567

Longitude: -93.270217

Photographer: Kerri McCabe

Description: Looking ESE, this photo shows the front view of the inside and outside of the secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: From Willisville (Irma Community), State Hwy 371, right on Hwy 76, then right on Nevada Rd 162, right onto an oilfield lease road at 33.535379, -93.270251.

City: Willisville (Irma)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0752

Orientation: 71° ENE

Date of Photo: 03/05/2025

Time of Photo: 1350

Latitude: 33.535550

Longitude: -93.270183

Photographer: Kerri McCabe

Description: Looking ENE, this photo shows a bucket full of crude oil on the berm of the secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: From Willisville (Irma Community), State Hwy 371, right on Hwy 76, then right on Nevada Rd 162, right onto an oilfield lease road at 33.535379, -93.270251.

City: Willisville (Irma)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0753

Orientation: 50° NE

Date of Photo: 03/05/2025

Time of Photo: 1350

Latitude: 33.535483

Longitude: -93.270100

Photographer: Kerri McCabe

Description: Looking NE, this photo shows a cap that has been replaced inside the secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: From Willisville (Irma Community), State Hwy 371, right on Hwy 76, then right on Nevada Rd 162, right onto an oilfield lease road at 33.535379, -93.270251.

City: Willisville (Irma)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0754

Orientation: 356° N

Date of Photo: 03/05/2025

Time of Photo: 1351

Latitude: 33.535417

Longitude: -93.270017

Photographer: Kerri McCabe

Description: Looking N, this photo shows a motor inside secondary containment that has been replaced.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: From Willisville (Irma Community), State Hwy 371, right on Hwy 76, then right on Nevada Rd 162, right onto an oilfield lease road at 33.535379, -93.270251.

City: Willisville (Irma)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0755

Orientation: 71° ENE

Date of Photo: 03/05/2025

Time of Photo: 1351

Latitude: 33.535417

Longitude: -93.269983

Photographer: Kerri McCabe

Description: Looking ENE, this photo shows the sump area of the secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: From Willisville (Irma Community), State Hwy 371, right on Hwy 76, then right on Nevada Rd 162, right onto an oilfield lease road at 33.535379, -93.270251.

City: Willisville (Irma)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0756

Orientation: 278° W

Date of Photo: 03/05/2025

Time of Photo: 1352

Latitude: 33.535633

Longitude: -93.269717

Photographer: Kerri McCabe

Description: Looking W, this photo shows the drainpipe for the secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: From Willisville (Irma Community), State Hwy 371, right on Hwy 76, then right on Nevada Rd 162, right onto an oilfield lease road at 33.535379, -93.270251.

City: Willisville (Irma)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0757

Orientation: 250° WSW

Date of Photo: 03/05/2025

Time of Photo: 1352

Latitude: 33.535583

Longitude: -93.269867

Photographer: Kerri McCabe

Description: Looking WSW, this photo shows an open-top tank used as a skimmer for the sump area of the secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: From Willisville (Irma Community), State Hwy 371, right on Hwy 76, then right on Nevada Rd 162, right onto an oilfield lease road at 33.535379, -93.270251.

City: Willisville (Irma)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0758

Orientation: 322° NW

Date of Photo: 03/05/2025

Time of Photo: 1352

Latitude: 33.535600

Longitude: -93.270017

Photographer: Kerri McCabe

Description: Looking NW, this photo shows loose crude oil and saltwater inside secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: From Willisville (Irma Community), State Hwy 371, right on Hwy 76, then right on Nevada Rd 162, right onto an oilfield lease road at 33.535379, -93.270251.

City: Willisville (Irma)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0759

Orientation: 131° SE

Date of Photo: 03/05/2025

Time of Photo: 1353

Latitude: 33.535683

Longitude: -93.270117

Photographer: Kerri McCabe

Description: Looking SE, this photo shows an additional view of the loose crude oil and saltwater inside secondary containment.