

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	12/02/2025	
Media Program:	Water (CWA)	
Regulatory Program(s)	Water (CWA) Brine Program (Oil & Gas inspection)	
Company Name:	Pharr, Billy W (dba B Pharr Operating, LLC)	
Facility Name:	Bo Gregory #2 SWD Tank Battery	
Facility Physical Location:	In Old Union from Highway 63 N, then Armer Rd, and left onto an oil lease road at 33.253333, -92.538889.	
(city, state, zip code)	El Dorado, AR, 71730	
Mailing address:	P.O. Box 130	
(city, state, zip code)	Emerson, AR, 71740	
County/Parish:	Union County	
Facility Phone Number	870-904-5573	
Facility Contact:	Billy Pharr	Owner / Operator
	bp@hydrooil.net	
FRS Number:	N/A	
Identification/Permit Number:	ARU002254	
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
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 Uma Lad arrived at the Pharr, Billy W (dba B Pharr Operating, LLC) / Bo Gregory #2 SWD Tank Battery ("facility") at 1500 on 12/02/2025 for an unannounced follow-up inspection. The facility is located from Highway 63 E, then Armer Rd, left onto an oil lease road at 33.253333, -92.538889. 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. The facility was originally inspected by Inspector Kerri McCabe on 10/08/2024.

FACILITY DESCRIPTION

EPA conducted a follow-up inspection on the Pharr, Billy W (dba B Pharr Operating, LLC) / Bo Gregory #2 SWD Tank Battery, which contained one (1) tank battery, four (4) storage/separation tanks for crude oil and saltwater, and two (2) Saltwater Disposal (SWD) wells.



Map 1. Aerial imagery (Google Earth dated 02/01/2025) of the Pharr, Billy W (dba B Pharr Operating, LLC) – Bo Gregory #2 SWD Tank Battery.

Section II – OBSERVATIONS

I observed the Pharr, Billy W (B Pharr Operating, LLC) / Bo Gregory #2 SWD Tank Battery signage and associated secondary containment, storage tanks, separators/treaters, and saltwater disposal (SWD) well; see Appendix 1 (Photograph Log), Photo No. 1. For additional GPS location and photo metadata, see Appendix 1.

I observed loose oil and oil staining inside the secondary containment, see Photo No. 2 through No. 5.

I observed an active leak of saltwater from a valve from a tank inside secondary containment, see Photo No. 5.

I observed disturbed soil at the drainpipe for the secondary containment berm, see Photo No. 6 through No. 10.

I observed the drainpipe for the secondary containment berm, see Photo No. 11.

I observed disturbed soil and stormwater flow indicators leading into a wooded area adjacent to the secondary containment berm, see Photo No. 12 through No. 14.

Section III – AREAS OF CONCERN

No closing conference was held due to no personnel with Pharr, Billy W (dba B Pharr Operating, LLC) being present during the inspection. In September 2025, EPA issued an Administrative Order (AO) to the operator for this site. Areas of concern at the time of the inspection include the following:

- Loose, residual crude oil inside and outside secondary containment at the facility (Photos No. 2-5),
- Crude oil and pooled saltwater inside secondary containment (Photos No. 2-5), and
- Open drainpipe for secondary containment berm without a valve or cap (Photo 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 – 14 photos taken 12/02/2025.

Appendix 1

Photograph Log

14 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Facility/Location:		Pharr, Billy W (dba B Pharr Operating) - Bo Gregory 2 SWD Tank Battery						
City:	El Dorado	County:	Union County	State:	AR	Direction:	SW	
Filename:	R0011018.JPG	Photo Date:		12/02/2025		Time:	15:35:55	
Photographer:	Kerri McCabe			Witness Name:		Uma Lad		



Description:	Looking SW, this photo shows the signage identifying the company and lease names of the B Pharr Operating - Bo Gregory 2 SWD Tank Battery (facility).		
Latitude:	33°15'12.522" N	Longitude:	92°32'20.538" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Facility/Location:		Pharr, Billy W (dba B Pharr Operating) - Bo Gregory 2 SWD Tank Battery						
City:	El Dorado	County:	Union County	State:	AR	Direction:	SE	
Filename:	R0011019.JPG	Photo Date:		12/02/2025		Time:	15:36:27	
Photographer:	Kerri McCabe			Witness Name:		Uma Lad		



Description:	Looking SE, this photo shows an interior view of the sump area of the containment with oil staining on the levee and oil sheen on the surface of accumulated stormwater.		
Latitude:	33°15'12.696" N	Longitude:	92°32'20.946" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Facility/Location:		Pharr, Billy W (dba B Pharr Operating) - Bo Gregory 2 SWD Tank Battery						
City:	El Dorado	County:	Union County	State:	AR	Direction:	NE	
Filename:	R0011020.JPG	Photo Date:		12/02/2025		Time:	15:36:53	
Photographer:	Kerri McCabe			Witness Name:		Uma Lad		



Description:	Looking ENE, this photo shows an interior view of the storage tanks in front of the sump area inside containment. The photo also shows oil staining on the containment levee, loose oil around tanks, and oil sheening on the surface of accumulated stormwater.		
Latitude:	33°15'12.306" N	Longitude:	92°32'20.988" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Facility/Location:		Pharr, Billy W (dba B Pharr Operating) - Bo Gregory 2 SWD Tank Battery						
City:	El Dorado	County:	Union County	State:	AR	Direction:	NE	
Filename:	R0011021.JPG	Photo Date:		12/02/2025		Time:	15:36:00	
Photographer:	Kerri McCabe			Witness Name:		Uma Lad		



Description:	Looking NE, this photo shows the interior view of the sump area inside containment with oil staining on the containment levee and oil sheening on the surface of accumulated stormwater.		
Latitude:	33°15'12.552" N	Longitude:	92°32'20.46" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Facility/Location:		Pharr, Billy W (dba B Pharr Operating) - Bo Gregory 2 SWD Tank Battery						
City:	El Dorado	County:	Union County	State:	AR	Direction:	NE	
Filename:	R0011022.JPG	Photo Date:		12/02/2025		Time:	15:36:37	
Photographer:	Kerri McCabe			Witness Name:		Uma Lad		



Description:	Looking NNE, this photo shows the storage tanks used for crude oil and saltwater storage. This photo also shows loose oil and oil sheening inside containment.		
Latitude:	33°15'12.438" N	Longitude:	92°32'21.06" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Facility/Location:		Pharr, Billy W (dba B Pharr Operating) - Bo Gregory 2 SWD Tank Battery						
City:	El Dorado	County:	Union County	State:	AR	Direction:	NE	
Filename:	R0011023.JPG	Photo Date:		12/02/2025		Time:	15:42:10	
Photographer:	Kerri McCabe			Witness Name:		Uma Lad		



Description:	Looking NE, this photo shows both the exterior and interior of the containment levee with disturbed soil observed around the drainpipe.		
Latitude:	33°15'12.036" N	Longitude:	92°32'20.616" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Facility/Location:		Pharr, Billy W (dba B Pharr Operating) - Bo Gregory 2 SWD Tank Battery						
City:	El Dorado	County:	Union County	State:	AR	Direction:	NE	
Filename:	R0011024.JPG	Photo Date:		12/02/2025		Time:	15:37:08	
Photographer:	Kerri McCabe			Witness Name:		Uma Lad		



Description:	Looking NE, this photo shows an additional view from Photo #6 with disturbed soil and the valve from the drainpipe removed.		
Latitude:	33°15'12.246" N	Longitude:	92°32'20.652" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Facility/Location:		Pharr, Billy W (dba B Pharr Operating) - Bo Gregory 2 SWD Tank Battery						
City:	El Dorado	County:	Union County	State:	AR	Direction:	N	
Filename:	R0011025.JPG	Photo Date:		12/02/2025		Time:	15:37:15	
Photographer:	Kerri McCabe			Witness Name:		Uma Lad		



Description:	Looking N, this photo shows a closeup of the valve that had been removed from the drainpipe from Photo #7.		
Latitude:	33°15'12.198" N	Longitude:	92°32'20.598" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Facility/Location:		Pharr, Billy W (dba B Pharr Operating) - Bo Gregory 2 SWD Tank Battery						
City:	El Dorado	County:	Union County	State:	AR	Direction:	W	
Filename:	R0011026.JPG	Photo Date:		12/02/2025		Time:	15:38:10	
Photographer:	Kerri McCabe			Witness Name:		Uma Lad		



Description:	Looking W, this photo shows the interior view of a disturbed area within the levee of the containment structure. This photo also shows a larger area of disturbed soil and a saltwater disposal (SWD) in the background.		
Latitude:	33°15'12.21" N	Longitude:	92°32'20.28" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Facility/Location:		Pharr, Billy W (dba B Pharr Operating) - Bo Gregory 2 SWD Tank Battery						
City:	El Dorado	County:	Union County	State:	AR	Direction:	N	
Filename:	R0011027.JPG	Photo Date:		12/02/2025		Time:	15:38:46	
Photographer:	Kerri McCabe			Witness Name:		Uma Lad		



Description:	Looking N, this photo shows the exterior view of the disturbed area within the containment levee.		
Latitude:	33°15'12.558" N	Longitude:	92°32'20.16" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Facility/Location:		Pharr, Billy W (dba B Pharr Operating) - Bo Gregory 2 SWD Tank Battery						
City:	El Dorado	County:	Union County	State:	AR	Direction:	N	
Filename:	R0011028.JPG	Photo Date:		12/02/2025		Time:	15:41:24	
Photographer:	Kerri McCabe			Witness Name:		Uma Lad		



Description:	Looking N, this photo shows the exterior view of the drainpipe for the containment structure with the valve and cap removed.		
Latitude:	33°15'12.03" N	Longitude:	92°32'20.376" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Facility/Location:		Pharr, Billy W (dba B Pharr Operating) - Bo Gregory 2 SWD Tank Battery						
City:	El Dorado	County:	Union County	State:	AR	Direction:	NE	
Filename:	R0011029.JPG	Photo Date:		12/02/2025		Time:	15:41:41	
Photographer:	Kerri McCabe			Witness Name:		Uma Lad		



Description:	Looking NE, this photo shows an area outside containment with disturbed soil and stormwater (surface) flow indicators.		
Latitude:	33°15'12.042" N	Longitude:	92°32'20.436" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Facility/Location:		Pharr, Billy W (dba B Pharr Operating) - Bo Gregory 2 SWD Tank Battery						
City:	El Dorado	County:	Union County	State:	AR	Direction:	NE	
Filename:	R0011030.JPG	Photo Date:		12/02/2025		Time:	15:42:21	
Photographer:	Kerri McCabe			Witness Name:		Uma Lad		



Description:	Looking ENE, this photo shows a continuation of the stormwater flow path and disturbed soil from Photo #12.		
Latitude:	33°15'12.06" N	Longitude:	92°32'20.472" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Facility/Location:		Pharr, Billy W (dba B Pharr Operating) - Bo Gregory 2 SWD Tank Battery						
City:	El Dorado	County:	Union County	State:	AR	Direction:	NE	
Filename:	R0011031.JPG	Photo Date:		12/02/2025		Time:	15:42:35	
Photographer:	Kerri McCabe			Witness Name:		Uma Lad		



Description:	Looking ENE, this photo shows a continuation of the stormwater flow path and disturbed soil from Photo #13.		
Latitude:	33°15'12.018" N	Longitude:	92°32'20.388" W