

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	8/16/2023	
Media Program:	Water	
Regulatory Program(s)	Clean Water Act	
Company Name:	Osage Pipe Line Company, LLC	
Facility Name:	Skull Creek	
Facility Physical Location:	Latitude: 36.029681, Longitude: -96.730622	
(city, state, zip code)	Cushing, OK, 74023	
Mailing address:	2828 N. Harwood, Suite 1300	
(city, state, zip code)	Dallas, Texas, 75201	
County/Parish:	Payne	
Facility Phone Number	918-345-2036	
Facility Contact:	Paul Richardson	Co-Owner
	Paul.Richardson@holyyenergy.com	
FRS Number:	NA	
Identification/Permit Number:	NA	
Media Identifier Number:	NA	
NAICS:	211111	
SIC:	1311	
Personnel participating in inspection:		
Michael Blaha	EPA/Region 6 ECDW	Enforcement Officer/Inspector
Matt Allen	EPA/Region 6 ECDW	Inspector
John Waken	START Contractor	Inspector
EPA Lead Inspector Signature/Date		
	Matthew Allen	Date
Supervisor Signature/Date		
	Jeanne Eckhart	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Michael Blaha and Matthew Allen, arrived at the Osage Pipe Line Company, LLC, N Norfolk Road bridge crossing (36.03895, -96.71417) at 8:15 AM on 8/16/2023 for an unannounced inspection. This was an inspection in response to a National Response Center Spill Report (NRC No. 1340898 and 1341082) which was received by EPA Region 6. No facility representatives were present at the time of the inspection. Osage Pipe Line Company, LLC's health and safety manager was present at the end of the inspection. The inspection was conducted by the authority of the Clean Water Act (CWA) to determine compliance with Environmental Protection Agency (EPA) regulation. EPA START contractor John Waken was present and participated during the inspection. There were no other federal, state, or local agency representatives present at the time of the inspection.

FACILITY DESCRIPTION

EPA conducted an inspection on a segment of Skull Creek between the dam (36.03839, -96.72499) and N Norfolk Road (36.03895, -96.71417), downstream from where a 20-inch diameter pipeline ruptured at the longitudinal seam weld, releasing a company reported volume of 7,100 barrels of Christina dilbit blend crude oil onto the land which migrated downgradient approximately 258 feet where it entered Skull Creek.

Section II - OBSERVATIONS

I observed sheen at the lowermost containment and boom site located on the west side of N Norfolk Road, see Appendix 1 (photo log), photos No. 1 and No.2. For additional GPS location and photo metadata, see Appendix 1.

I observed the vegetation and topography features of Skull creek between the dam and the bridge crossing on N Norfolk Road. See photos No. 4 through 9 and photo No. 11 of the photo log.

I observed an absorbent boom with foam approximately 30 yards downstream from the dam, see photo No. 10.

I observed oil sheen approximately 20 yards upstream from where the lowermost containment dam was previously located. At the time of the inspection, the containment dam was no longer present. See photo No. 12.

Section III – AREAS OF CONCERN

No closing conference was held due to no Osage Pipe Line Company, LLC staff being present during the inspection.

My primary area of concern was the oil sheen observed at the lowermost boom site located just west of N Norfolk Road, which was downstream of all ongoing cleanup and restoration activities being conducted.

Section IV – FOLLOW UP

Inspector will conduct follow-up phone calls with the company representatives as well as follow-up inspections to observe cleanup progress over the coming weeks and months. EPA OSC contractor (John Waken) present during the inspection will be reporting the information found to Bray Fisher (EPA OSC).

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 12 photos taken 8/16/2023

Appendix 1

Photograph Log

12 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: 36.03895, -96.71389		
City: Cushing	County/Parish: Payne	State: Oklahoma



Photo File Name: R0010200

Orientation: WSW

Date of Photo: 8/16/2023

Time of Photo: 10:47 AM

Latitude: 36.03895

Longitude: 96.71389

Photographer: Michael Blaha

Description: Lowermost containment and absorbent boom located off N Norfolk Road with sheen present.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: 36.03895, -96.71389		
City: Cushing	County/Parish: Payne	State: Oklahoma



Photo File Name: R0010202

Orientation: SW

Date of Photo: 8/16/2023

Time of Photo: 10:51 AM

Latitude: 36.03895

Longitude: -96.71414

Photographer: Michael Blaha

Description: Zoomed in photo of oil sheen present at the boom site off N Norfolk Road.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: 36.03895, -96.71389		
City: Cushing	County/Parish: Payne	State: Oklahoma



Photo File Name: R0010201

Orientation: E

Date of Photo: 8/16/2023

Time of Photo: 10:50 AM

Latitude: 36.03889

Longitude: -96.71404

Photographer: Michael Blaha

Description: This photo was taken at the boom off N Norfolk Road, with a view looking downstream.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: 36.03895, -96.71389		
City: Cushing	County/Parish: Payne	State: Oklahoma



Photo File Name: R0010191

Orientation: N

Date of Photo: 8/16/2023

Time of Photo: 9:25 AM

Latitude: 36.03788

Longitude: -96.72289

Photographer: Michael Blaha

Description: This was a photo with a N or upstream view, showing the topography and vegetation of the tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: 36.03895, -96.71389		
City: Cushing	County/Parish: Payne	State: Oklahoma



Photo File Name: R0010192

Orientation: ENE

Date of Photo: 8/16/2023

Time of Photo: 9:25 AM

Latitude: 36.03793

Longitude: -96.72296

Photographer: Michael Blaha

Description: This was a photo of a shallow point, showing the topography and vegetation of the tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: 36.03895, -96.71389		
City: Cushing	County/Parish: Payne	State: Oklahoma



Photo File Name: R0010193

Orientation: NNE

Date of Photo: 8/16/2023

Time of Photo: 9:38 AM

Latitude: 36.03761

Longitude: -96.72458

Photographer: Michael Blaha

Description: This was a photo with a NNE or downstream view, showing the topography and vegetation of the tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: 36.03895, -96.71389		
City: Cushing	County/Parish: Payne	State: Oklahoma



Photo File Name: R0010194

Orientation: N

Date of Photo: 8/16/2023

Time of Photo: 9:41 AM

Latitude: 36.03738

Longitude: -96.7252

Photographer: Michael Blaha

Description: This was a photo with a N or upstream view, showing the topography and vegetation of the tributary taken at the same location as photo 6.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: 36.03895, -96.71389		
City: Cushing	County/Parish: Payne	State: Oklahoma



Photo File Name: R0010195

Orientation: E

Date of Photo: 8/16/2023

Time of Photo: 9:41 AM

Latitude: 36.03739

Longitude: -96.72531

Photographer: Michael Blaha

Description: This was a photo with a E or downstream view, showing the topography and vegetation of the tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: 36.03895, -96.71389		
City: Cushing	County/Parish: Payne	State: Oklahoma



Photo File Name: R0010196

Orientation: S

Date of Photo: 8/16/2023

Time of Photo: 9:47 AM

Latitude: 36.03817

Longitude: -96.72543

Photographer: Michael Blaha

Description: This was a photo with a S or downstream view, showing the topography and vegetation of the tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: 36.03895, -96.71389		
City: Cushing	County/Parish: Payne	State: Oklahoma



Photo File Name: R0010197

Orientation: ESE

Date of Photo: 8/17/2023

Time of Photo: 9:47 AM

Latitude: 36.03815

Longitude: -96.72539

Photographer: Michael Blaha

Description: This was a photo taken downstream from the lowermost containment dam location. At the time of the inspection, the containment dam was no longer present. This was a photo with ESE view, showing an absorbent boom and foam floating on the surface of the impacted tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: 36.03895, -96.71389		
City: Cushing	County/Parish: Payne	State: Oklahoma



Photo File Name: R0010198

Orientation: ENE

Date of Photo: 8/16/2023

Time of Photo: 9:47 AM

Latitude: 36.03816

Longitude: -96.72539

Photographer: Michael Blaha

Description: This was a photo taken immediately downstream from the lowermost containment dam, the dam was no longer present at the time of the inspection. This was a photo with ESE/upstream view, showing the location where the dam was previously located.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: 36.03895, -96.71389		
City: Cushing	County/Parish: Payne	State: Oklahoma



Photo File Name: R0010199

Orientation: NA

Date of Photo: 8/16/2023

Time of Photo: 10:02 AM

Latitude: 36.03881

Longitude: -96.72487

Photographer: Michael Blaha

Description: This was a photo taken upstream from the dam location, showing sheen caught between the absorbent and containment booms.