

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:	C12: Arkansas Oil, LLC	
Facility Name:	Midway Smackover Unit Tract #17 Tank Battery	
Facility Physical Location:	From Lewisville (Baker Community), at State Hwy 82 East, left on State Hwy 29, right on Lafayette CR 25, and then right onto an oilfield lease road at 33.459617, -93.582800.	
(city, state, zip code)	Lewisville, AR 71845	
Mailing address:	Hwy 25 1124	
(city, state, zip code)	Lowerville, AR 71545	
County/Parish:	Lafayette County	
Facility Phone Number	501-772-3456	
Facility Contact:	Paul Appel (832-628-3016)	Person Responsible for Operation
	Robert Thomasson, Representative / robert@standardgas.org	
FRS Number:	N/A	
Identification/Permit Number:	ARU002304	
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
Paul Appel	C12: Arkansas Oil, LLC	Spill Coordinator
Robert Thomasson	C12: Arkansas Oil, LLC	Regulator Compliance Coordinator
Jeff Buehler	C12: Arkansas Oil, LLC	Emergency Contact
Michael Pearson	C12: Arkansas Oil, LLC	Pumper
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), Uma Lad, and Tom McKay (for Spill Prevention Control and Countermeasure (SPCC) inspection) arrived at the C12: Arkansas Oil, LLC / Midway Smackover Unit Tract #17 Tank Battery (“facility”) located from State Highway 82 East, left on State Highway 29, right on Lafayette County Road 25, and then right onto an oilfield lease road at 33.459617, -93.582800 in Lewisville (Baker Community), Lafayette County, Arkansas; at 1300 on 01/14/2026 for an announced inspection. Mr. Paul Appel 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 04/17/2025 under the Brine Program.

FACILITY DESCRIPTION

EPA conducted an inspection on the C12: Arkansas Oil, LLC / Midway Smackover Unit Tract #17 Tank Battery facility, which contains four (4) tank batteries with a total of ten (10) tanks that include storage, separation, and free water knock out (FWKO) for crude oil and saltwater processing and storage.



Map 1. Aerial imagery (Google Earth dated 10/30/2023) of the C12: Arkansas Oil, LLC / Midway Smackover Unit Tract #17 Tank Battery facility.

Section II - OBSERVATIONS

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

I observed a tank battery with a “test” tank and the associated load line, see Photos No. 3 and No. 4.

I observed loose oil inside the oil storage tank battery (Area 1), see Photo No. 5.

I observed the saltwater disposal (SWD) tank battery (Area 2) and drainpipe, see Photos No. 6 and No. 7.

I observed the separator tank battery (Area 3) and berm that C12: Arkansas Oil, LLC personnel repaired since the 04/17/2025 inspection, see Photos No. 8 and No. 9.

I observed C12: Arkansas Oil, LLC personnel remediate the loose oil in the oil storage tank battery (Area 1), see Photos No. 10 and No. 11.

Section III – AREAS OF CONCERN

EPA Region 6 inspectors held a closing conference with Mr. Paul Appel of C12: Arkansas Oil, LLC after the inspection. Areas of concern under the SPCC rule at the time of the inspection include the following:

- Load line for “test” tank outside secondary containment, 40 CFR §112.7(c) (Photos No. 2 through No. 4), and
- Loose oil inside the oil storage tank battery (Area 1), 40 CFR §112.9(b)(1) (Photo No. 5); C12: Arkansas Oil, LLC personnel remediated the loose oil during the inspection (Photos No. 10 and 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. SEE Inspector Tom McKay will address SPCC rule concerns.

Section V – LIST OF APPENDICES

Appendix 1 – Photograph Log – 11 photos taken on 01/14/2026.

Appendix 1

Photograph Log

11 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Facility/Location:		C12: Arkansas Oil, LLC Midway Smackover Unit Tract 17						
City:	Lewisville	County:	Lafayette County	State:	AR	Direction:	SW	
Filename:	R0011291.JPG	Photo Date:		01/14/2026		Time:	13:16:02	
Photographer:	Kerri McCabe			Witness Name:		Tom McKay		



Description:	Looking SSW, this photo shows the signage for the Midway Smackover Unit Tract 17 Tank Battery ("facility").		
Latitude:	33°27'34.782" N	Longitude:	93°34'58.344" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Facility/Location:		C12: Arkansas Oil, LLC Midway Smackover Unit Tract 17						
City:	Lewisville	County:	Lafayette County	State:	AR	Direction:	SW	
Filename:	R0011292.JPG	Photo Date:		01/14/2026		Time:	13:17:08	
Photographer:	Kerri McCabe			Witness Name:		Tom McKay		



Description:	Looking SSW, this photo shows an overview of the facility.		
Latitude:	33°27'33.786" N	Longitude:	93°34'58.374" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Facility/Location:		C12: Arkansas Oil, LLC Midway Smackover Unit Tract 17						
City:	Lewisville	County:	Lafayette County	State:	AR	Direction:	S	
Filename:	R0011293.JPG	Photo Date:		01/14/2026		Time:	13:16:49	
Photographer:	Kerri McCabe			Witness Name:		Tom McKay		



Description:	Looking S, this photo shows the tank battery for a "test" tank.		
Latitude:	33°27'33.78" N	Longitude:	93°34'58.242" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Facility/Location:		C12: Arkansas Oil, LLC Midway Smackover Unit Tract 17						
City:	Lewisville	County:	Lafayette County	State:	AR	Direction:	S	
Filename:	R0011294.JPG	Photo Date:		01/14/2026		Time:	13:24:04	
Photographer:	Kerri McCabe			Witness Name:		Tom McKay		



Description:	Looking S, this photo shows the load line for the "test" tank battery without a secondary containment.		
Latitude:	33°27'34.716" N	Longitude:	93°34'57.546" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Facility/Location:		C12: Arkansas Oil, LLC Midway Smackover Unit Tract 17						
City:	Lewisville	County:	Lafayette County	State:	AR	Direction:	SW	
Filename:	R0011295.JPG	Photo Date:		01/14/2026		Time:	13:18:11	
Photographer:	Kerri McCabe			Witness Name:		Tom McKay		



Description:	Looking WSW, this photo shows loose oil inside the FWKO tank battery.		
Latitude:	33°27'34.08" N	Longitude:	93°34'58.098" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Facility/Location:		C12: Arkansas Oil, LLC Midway Smackover Unit Tract 17						
City:	Lewisville	County:	Lafayette County	State:	AR	Direction:	SW	
Filename:	R0011296.JPG	Photo Date:		01/14/2026		Time:	13:26:28	
Photographer:	Kerri McCabe			Witness Name:		Tom McKay		



Description:	Looking SW, this photo shows an overview of the saltwater disposal (SWD) injection well tank battery with a repaired containment berm.		
Latitude:	33°27'35.4" N	Longitude:	93°34'57.93" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Facility/Location:		C12: Arkansas Oil, LLC Midway Smackover Unit Tract 17						
City:	Lewisville	County:	Lafayette County	State:	AR	Direction:	SW	
Filename:	R0011297.JPG	Photo Date:		01/14/2026		Time:	13:29:25	
Photographer:	Kerri McCabe			Witness Name:		Tom McKay		



Description:	Looking WSW, this photo shows the drainpipe for the SWD tank battery with closed valve and cap.		
Latitude:	33°27'36.036" N	Longitude:	93°34'56.898" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Facility/Location:		C12: Arkansas Oil, LLC Midway Smackover Unit Tract 17						
City:	Lewisville	County:	Lafayette County	State:	AR	Direction:	S	
Filename:	R0011298.JPG	Photo Date:		01/14/2026		Time:	13:26:42	
Photographer:	Kerri McCabe			Witness Name:		Tom McKay		



Description:	Looking S, this photo shows the tank battery for the separators with a repaired containment berm.		
Latitude:	33°27'35.562" N	Longitude:	93°34'57.852" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Facility/Location:		C12: Arkansas Oil, LLC Midway Smackover Unit Tract 17						
City:	Lewisville	County:	Lafayette County	State:	AR	Direction:	SW	
Filename:	R0011299.JPG	Photo Date:		01/14/2026		Time:	13:31:28	
Photographer:	Kerri McCabe			Witness Name:		Tom McKay		



Description:	Looking SW, this photo shows a closeup of the containment berm repairs for Photo No. 8.		
Latitude:	33°27'36.096" N	Longitude:	93°34'55.884" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Facility/Location:		C12: Arkansas Oil, LLC Midway Smackover Unit Tract 17						
City:	Lewisville	County:	Lafayette County	State:	AR	Direction:	SW	
Filename:	R0011300.JPG	Photo Date:		01/14/2026		Time:	13:41:15	
Photographer:	Kerri McCabe			Witness Name:		Tom McKay		



Description:	Looking WSW, this photo shows the loose oil from Photo No. 5 removed by C12: Arkansas Oil, LLC personnel during the inspection.		
Latitude:	33°27'34.698" N	Longitude:	93°34'57.714" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Facility/Location:		C12: Arkansas Oil, LLC Midway Smackover Unit Tract 17						
City:	Lewisville	County:	Lafayette County	State:	AR	Direction:	SW	
Filename:	R0011301.JPG	Photo Date:		01/14/2026		Time:	13:41:42	
Photographer:	Kerri McCabe			Witness Name:		Tom McKay		



Description:	Looking WSW, this photo shows the loose oil from Photo No. 5 placed in a drum for proper disposal.		
Latitude:	33° 27'34.62" N	Longitude:	93°34'57.804" W