

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	4/2/24	
Media Program:	Water (CWA)	
Regulatory Program(s)	Water (CWA) Brine Program (Oil & Gas inspection)	
Company Name:	RCP Production, LLC	
Facility Name:	TD Murphy B-3 SWD Tank Battery	
Facility Physical Location:	From Highway 7 Business, thence Gas Plant Road, thence All Gulf Road, off oil field lease road in Smackover (Sandy Land) at 33.341155, -92.690976	
(city, state, zip code)	Smackover, AR 71762	
Mailing address:	134 Daniel Road	
(city, state, zip code)	Smackover, AR 71762	
County/Parish:	Union County	
Facility Phone Number	870-814-9942	
Facility Contact:	Rod Phillips rod_phillips2000@yahoo.com	Person Responsible for Operation
FRS Number:	N/A	
Identification/Permit Number:	ARU002227	
Media Identifier Number:	N/A	
NAICS:	211111	
SIC:	1311	
Personnel participating in inspection:		
Kerri McCabe (lead)	EPA / Region 6 ECDW	Inspector / Enforcement Officer
Rod Phillips	RCP Production, LLC	Owner / Operator
EPA Lead Inspector Signature/Date		
	Kerri McCabe	Date
Supervisor Signature/Date		
	Jeanne Eckhart	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 Inspector Kerri McCabe (lead) arrived at the RCP Production, LLC / TD Murphy B-3 SWD Tank Battery release, located off an oil lease road off All Gulf Road in Smackover at 33.341485, -92.686930; at 1630 on 4/2/24 for an announced inspection. Mr. Rod Phillips, RCP Production, LLC; 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.

FACILITY DESCRIPTION

EPA conducted an inspection on the RCP Production, LLC / TD Murphy B-3 SWD Tank Battery as a follow-up to a release from the tank battery that had occurred on 3/12/24. EPA collected Total Dissolved Solids (TDS) readings from areas sampled during the 3/12/24 and 3/13/24 inspections.

Section II - OBSERVATIONS

A Total Dissolved Solids (TDS) reading of 832 mg/L was taken in a pool at a wetland upstream of a culvert in an oil field lease road and downstream of the TD Murphy B-3 SWD tank battery release, see Appendix 1 (Photographs Log), Photo No. 1 through No. 3. For additional GPS location and photo metadata, see Appendix 1.

Another TDS reading of 807 mg/L was taken directly downstream of the pool and the culvert in the same conveyance as the first TDS reading, see Photo No. 4 through No. 6.

A TDS reading of 562 mg/L, for background comparison, was taken upstream of the pool, see Photo No. 7 through No. 9.

A TDS reading of 1,439 mg/L was taken downstream of the wetland area in the receiving stream, see Photo No. 10 through No. 12.

A final TDS reading of 1,449 mg/L was taken downstream of the reading from Photo No. 10, see Photo No. 13 through No. 15.

A comparison between the facility-owned meter and the Brine Program meter was conducted on samples collected by the operator throughout March 2024, see Photo No. 16.

I observed the meter purchased and utilized by the operator, see Photo No. 17.

The sample used for analysis comparison was collected on 3/19/24 by the operator, see Photo No. 18.

The TDS reading for the 3/19/24 sample reported from the facility-owned meter was 4,500 ppm, see Photo No. 19.

The TDS reading for the 3/19/24 sample reported from the Brine Program meter was 4,730 mg/L, see Photo No. 20.

All TDS field readings observed throughout the inspection were taken with a properly calibrated, EPA-issued, YSI Pro30 Conductivity/TDS/Salinity/Temperature Meter (#Y60530).

Section III – AREAS OF CONCERN

A closing conference was held with Mr. Rod Phillips, RCP Production, LLC; to discuss the findings of the inspection. Areas of concern at the time of the inspection include the elevated TDS readings from the surface water along the discharge conveyance.

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.

A follow-up inspection will be conducted on 5/9/24.

Section V – LIST OF APPENDICES

Appendix 1 – Photograph Log – 20 photos taken 4/2/24.

Appendix 1

Photograph Log

20 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: RCP Production, LLC – TD Murphy B-3 SWD off Union County Rd 713 from oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: P4020034

Orientation: W

Date of Photo: 04/02/2024

Time of Photo: 1701

Latitude: 33.341550

Longitude: -92.687078

Photographer: Kerri McCabe

Description: Looking W, this photo showed the Total Dissolved Solids (TDS) reading at the pond off All Gulf Rd that is downstream from the TD Murphy B-3 SWD tank battery release.

Meter	YSI Pro30 Conductivity/TDS/Salinity/Temperature Meter #Y60530
Date / Time	April 02, 2024 / 1701
TSD / Temperature	832 mg/L at 24.0 degC
Sampler / Analyzer	Kerri McCabe



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: RCP Production, LLC – TD Murphy B-3 SWD off Union County Rd 713 from oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: P4020035

Orientation: SE

Date of Photo: 04/02/2024

Time of Photo: 1701

Latitude: 33.341550

Longitude: -92.687078

Photographer: Kerri McCabe

Description: Looking SE, this photo showed the upstream view at the TDS reading location in Photo No. 1.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: RCP Production, LLC – TD Murphy B-3 SWD off Union County Rd 713 from oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: P4020036

Orientation: SW

Date of Photo: 04/02/2024

Time of Photo: 1702

Latitude: 33.341550

Longitude: -92.687078

Photographer: Kerri McCabe

Description: Looking SW, this photo showed the downstream view at the TDS reading location in Photo No. 1.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: RCP Production, LLC – TD Murphy B-3 SWD off Union County Rd 713 from oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: P4020038

Orientation: W

Date of Photo: 04/02/2024

Time of Photo: 1704

Latitude: 33.341412

Longitude: -92.686812

Photographer: Kerri McCabe

Description: Looking W, this photo showed the TDS reading directly downstream of the pond off All Gulf Rd that is downstream from the TD Murphy B-3 SWD tank battery release.

Meter	YSI Pro30 Conductivity/TDS/Salinity/Temperature Meter #Y60530
Date / Time	April 02, 2024 / 1704
TSD / Temperature	807 mg/L at 24.4 degC
Sampler / Analyzer	Kerri McCabe



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: RCP Production, LLC – TD Murphy B-3 SWD off Union County Rd 713 from oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: P4020039

Orientation: SE

Date of Photo: 04/02/2024

Time of Photo: 1704

Latitude: 33.341412

Longitude: -92.686812

Photographer: Kerri McCabe

Description: Looking SE, this photo showed the upstream view at the TDS reading location in Photo No. 4.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: RCP Production, LLC – TD Murphy B-3 SWD off Union County Rd 713 from oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: P4020040

Orientation: SW

Date of Photo: 04/02/2024

Time of Photo: 1704

Latitude: 33.341412

Longitude: -92.686812

Photographer: Kerri McCabe

Description: Looking SW, this photo showed the downstream view at the TDS reading location in Photo No. 4.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: RCP Production, LLC – TD Murphy B-3 SWD off Union County Rd 713 from oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: P4020041

Orientation: E

Date of Photo: 04/02/2024

Time of Photo: 1719

Latitude: 33.341109

Longitude: -92.689790

Photographer: Kerri McCabe

Description: Looking E, this photo showed the TDS reading upstream of the pond off All Gulf Rd that is downstream from the TD Murphy B-3 SWD tank battery release.

Meter	YSI Pro30 Conductivity/TDS/Salinity/Temperature Meter #Y60530
Date / Time	April 02, 2024 / 1719
TSD / Temperature	562 mg/L at 20.2 degC
Sampler / Analyzer	Kerri McCabe



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: RCP Production, LLC – TD Murphy B-3 SWD off Union County Rd 713 from oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: P4020042

Orientation: E-SE

Date of Photo: 04/02/2024

Time of Photo: 1720

Latitude: 33.341109

Longitude: -92.689790

Photographer: Kerri McCabe

Description: Looking E-SE, this photo showed the upstream view at the TDS reading location in Photo No. 7.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: RCP Production, LLC – TD Murphy B-3 SWD off Union County Rd 713 from oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: P4020043

Orientation: W

Date of Photo: 04/02/2024

Time of Photo: 1720

Latitude: 33.341109

Longitude: -92.689790

Photographer: Kerri McCabe

Description: Looking W, this photo showed the downstream view at the TDS reading location in Photo No. 7.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: RCP Production, LLC – TD Murphy B-3 SWD off Union County Rd 713 from oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas

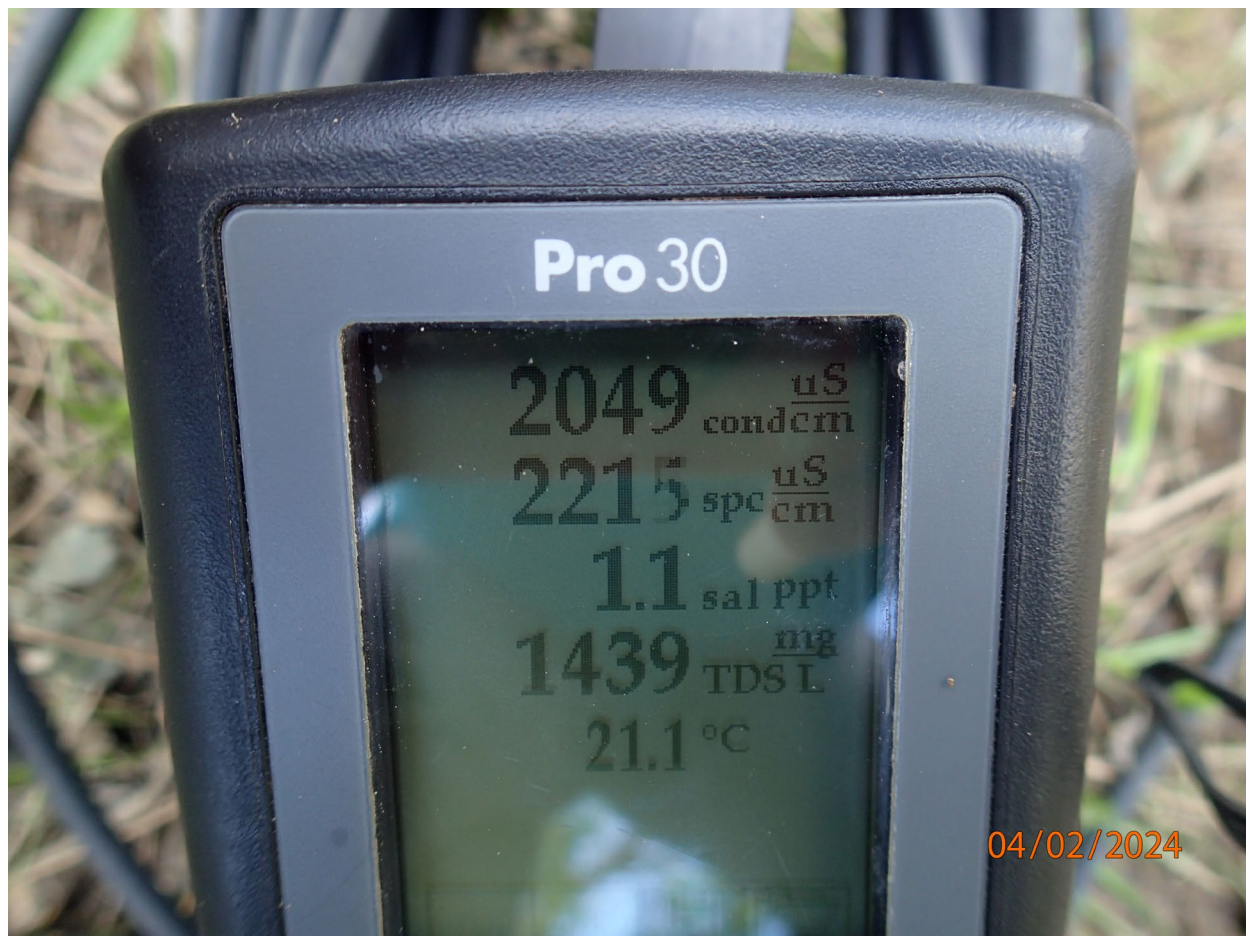


Photo File Name: P4020044

Orientation: N-NE

Date of Photo: 04/02/2024

Time of Photo: 1738

Latitude: 33.344938

Longitude: -92.683762

Photographer: Kerri McCabe

Description: Looking N-NE, this photo showed the TDS reading in the receiving stream downstream of the pond off All Gulf Rd that is downstream from the TD Murphy B-3 SWD tank battery release.

Meter	YSI Pro30 Conductivity/TDS/Salinity/Temperature Meter #Y60530
Date / Time	April 02, 2024 / 1738
TSD / Temperature	1,439 mg/L at 21.1 degC
Sampler / Analyzer	Kerri McCabe



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: RCP Production, LLC – TD Murphy B-3 SWD off Union County Rd 713 from oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: P4020045

Orientation: S-SW

Date of Photo: 04/02/2024

Time of Photo: 1739

Latitude: 33.344938

Longitude: -92.683762

Photographer: Kerri McCabe

Description: Looking E-SE, this photo showed the upstream view at the TDS reading location in Photo No. 10.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: RCP Production, LLC – TD Murphy B-3 SWD off Union County Rd 713 from oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: P4020046

Orientation: NW

Date of Photo: 04/02/2024

Time of Photo: 1739

Latitude: 33.344938

Longitude: -92.683762

Photographer: Kerri McCabe

Description: Looking NW, this photo showed the downstream view at the TDS reading location in Photo No. 10.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: RCP Production, LLC – TD Murphy B-3 SWD off Union County Rd 713 from oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas

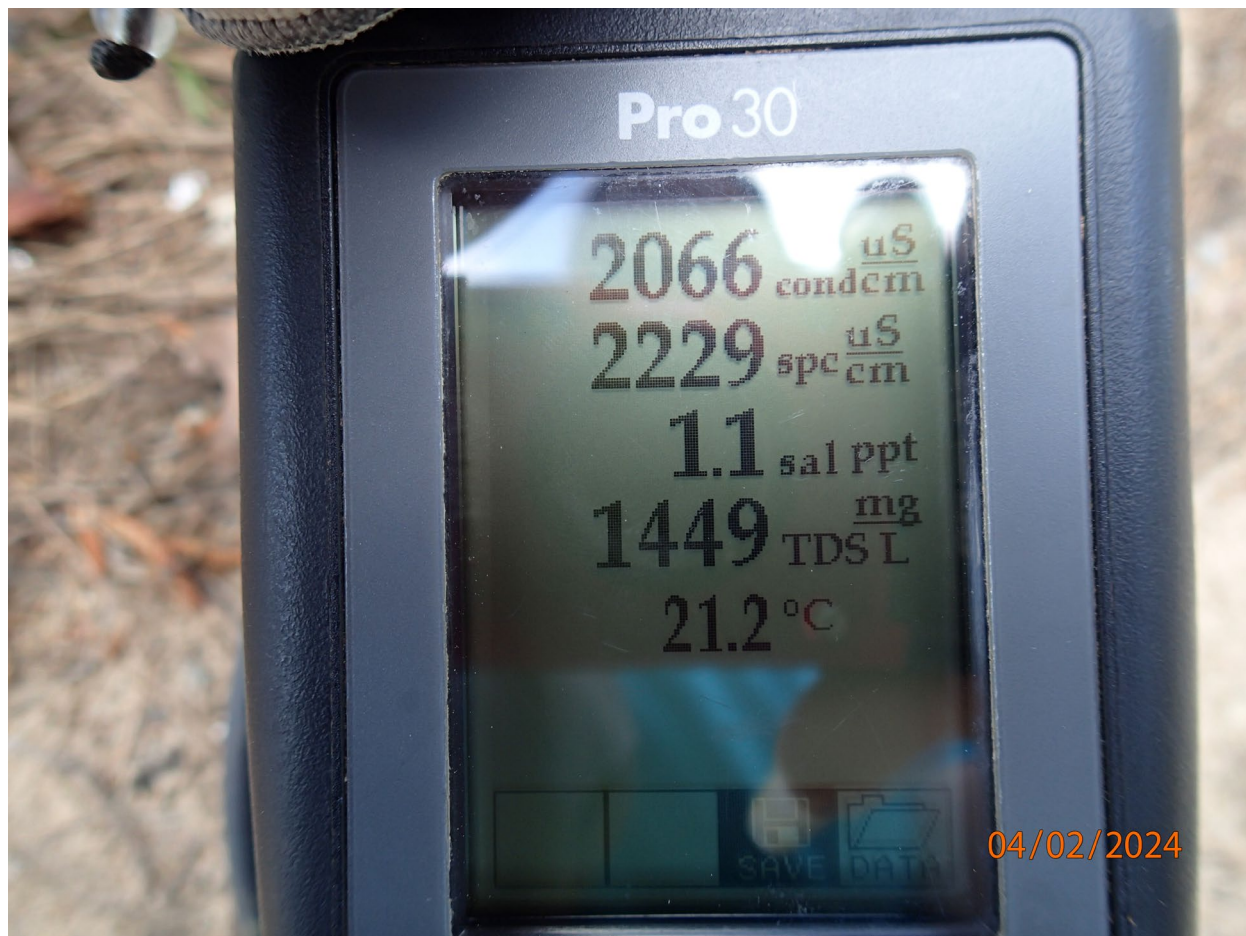


Photo File Name: P4020047

Orientation: SE

Date of Photo: 04/02/2024

Time of Photo: 1748

Latitude: 33.346081

Longitude: -92.682973

Photographer: Kerri McCabe

Description: Looking SE, this photo showed the TDS reading in the receiving stream at the bridge crossing downstream of the pond off All Gulf Rd.

Meter	YSI Pro30 Conductivity/TDS/Salinity/Temperature Meter #Y60530
Date / Time	April 02, 2024 / 1748
TSD / Temperature	1,449 mg/L at 21.2 degC
Sampler / Analyzer	Kerri McCabe



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: RCP Production, LLC – TD Murphy B-3 SWD off Union County Rd 713 from oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: P4020048

Orientation: S-SE

Date of Photo: 04/02/2024

Time of Photo: 1748

Latitude: 33.346081

Longitude: -92.682973

Photographer: Kerri McCabe

Description: Looking S-SE, this photo showed the upstream view at the TDS reading location in Photo No. 13.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: RCP Production, LLC – TD Murphy B-3 SWD off Union County Rd 713 from oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: P4020049

Orientation: S-SW

Date of Photo: 04/02/2024

Time of Photo: 1748

Latitude: 33.346081

Longitude: -92.682973

Photographer: Kerri McCabe

Description: Looking S-SW, this photo showed the downstream view at the TDS reading location in Photo No. 13.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: RCP Production, LLC – TD Murphy B-3 SWD off Union County Rd 713 from oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: P4020050

Orientation: N-NW

Date of Photo: 04/02/2024

Time of Photo: 1751

Latitude: 33.346481

Longitude: -92.683323

Photographer: Kerri McCabe

Description: Looking N-NW, this photo showed the water samples collected by Mr. Rod Phillips of RCP Production, LLC.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: RCP Production, LLC – TD Murphy B-3 SWD off Union County Rd 713 from oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: P4020051

Orientation: N

Date of Photo: 04/02/2024

Time of Photo: 1751

Latitude: 33.346481

Longitude: -92.683323

Photographer: Kerri McCabe

Description: Looking N, this photo showed the meter (Walfront Model No. EZ-9909SP) used by Mr. Rod Phillips of RCP Production, LLC.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: RCP Production, LLC – TD Murphy B-3 SWD off Union County Rd 713 from oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: P4020052

Orientation: N

Date of Photo: 04/02/2024

Time of Photo: 1752

Latitude: 33.346481

Longitude: -92.683323

Photographer: Kerri McCabe

Description: Looking N, this photo showed the March 19, 2024 sample (TDS reading is reported as 3,387 ppm) collected by Mr. Rod Phillips of RCP Production, LLC; this sample was used for meter comparison.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: RCP Production, LLC – TD Murphy B-3 SWD off Union County Rd 713 from oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: P4020053

Orientation: NW

Date of Photo: 04/02/2024

Time of Photo: 1753

Latitude: 33.346481

Longitude: -92.683323

Photographer: Kerri McCabe

Description: Looking NW, this photo showed the TDS reading of the March 19, 2024 sample from the meter utilized by Mr. Rod Phillips of RCP Production, LLC.; TDS reading was 4,500 ppm.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

Location: RCP Production, LLC – TD Murphy B-3 SWD off Union County Rd 713 from oil field lease road at 33.341155, -92.690976.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: P4020054

Orientation: NW

Date of Photo: 04/02/2024

Time of Photo: 1755

Latitude: 33.346481

Longitude: -92.683323

Photographer: Kerri McCabe

Description: Looking NW, this photo showed the TDS reading of the March 19, 2024 sample from the meter utilized by USEPA Region 6; TDS reading was 4,730 mg/L.