

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 #3 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 33.443267, -93.533467.	
(city, state, zip code)	Lewisville, AR 71845	
Mailing address:	Hwy 25 1124	
(city, state, zip code)	Lewisville, 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:	ARU002303	
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	Regulatory 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

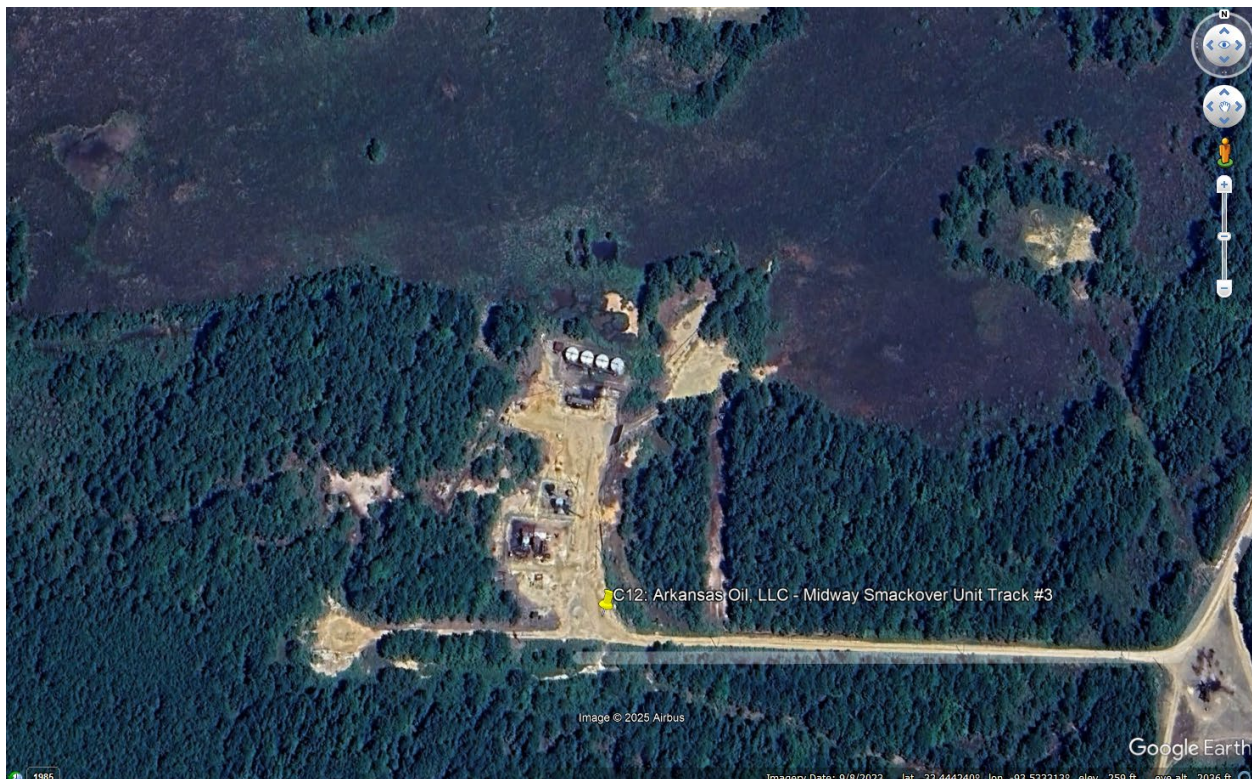
Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Kerri McCabe (lead), Uma Lad, Tom McKay (for Spill Prevention Control and Countermeasure (SPCC) inspection)) arrived at the C12: Arkansas Oil, LLC / Midway Smackover Unit Tract #3 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 33.443267, -93.533467 in Lewisville (Baker Community), Lafayette County, Arkansas; at 1400 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 #3 Tank Battery facility, which contains four (4) tank batteries for a total of ten (10) tanks that include storage, separation, and free water knock out (FWKO) for crude oil and saltwater processing and storage; and three (3) Class II saltwater disposal (SWD) injection wells. There are four (4) additional storage tanks for refined product.



Map 1. Aerial imagery (Google Earth dated 09/08/2023) of the C12: Arkansas Oil, LLC / Midway Smackover Unit Tract #3 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 the SWD injection well tank battery (Area 2) and drainpipe, see Photos No. 3 and No. 4.

I observed the oil storage tank battery (Area 1) and drainpipe, see Photos No. 5 and No. 6.

I observed loose oil inside the oil storage tank battery, see Photo No. 7.

I observed the Free-water Knockout (FWKO) tank battery (Area 3) and a load line without secondary containment, see Photo No. 8.

I observed loose oil from a section of piping at the FWKO tank battery, see Photo No. 9.

I observed an additional oil storage tank battery with four (4) bolted tanks, see Photo No. 10.

I observed one (1) bolted tank undergoing permanent closure (i.e., cleaned, plated/manway removed, and tagged, etc.), see Photos No. 11 through No. 14.

I observed a tote with crude oil outside secondary containment near the FWKO tank battery, see Photos No. 8 and No. 15.

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:

- Loose oil inside the oil storage tank battery (Area 1), 40 CFR §112.9(b)(1) (Photo No. 7),
- Load line for FWKO tank battery (Area 3) without secondary containment, 40 CFR §112.7(c) (Photo No. 8),
- Loose oil from piping at the FWKO tank battery, 40 CFR §112.9(b)(1) (Photo No. 9),
- A tote (near the FWKO tank battery) used to store crude oil located outside secondary containment, 40 CFR §112.7(c) (Photos No. 8 and No. 15), and
- Loose oil inside oil storage tank battery (bolted tanks), 40 CFR §112.9(b)(1) (Photos No. 12 and No. 14)

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 – 15 photos taken on 01/14/2026.

Appendix 1

Photograph Log

15 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Facility/Location:		C12: Arkansas Oil, LLC Midway Smackover Unit Tract 3 Tank Battery						
City:	Lewisville	County:	Lafayette County	State:	AR	Direction:	SSW	
Filename:	R0011303.JPG	Photo Date:		01/14/2026		Time:	14:12:53	
Photographer:	Kerri McCabe			Witness Name:		Tom McKay		



Description:	Looking SSW, this photo shows the signage for the Midway Smackover Unit Tract 3 Tank Battery ("facility").		
Latitude:	33°26'35.766" N	Longitude:	93°32'0.276" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Facility/Location:		C12: Arkansas Oil, LLC Midway Smackover Unit Tract 3 Tank Battery						
City:	Lewisville	County:	Lafayette County	State:	AR	Direction:	SW	
Filename:	R0011304.JPG	Photo Date:		01/14/2026		Time:	14:13:27	
Photographer:	Kerri McCabe			Witness Name:		Tom McKay		



Description:	Looking SW, this photo shows an overview of the facility.		
Latitude:	33°26'36.024" N	Longitude:	93°32'1.146" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Facility/Location:		C12: Arkansas Oil, LLC Midway Smackover Unit Tract 3 Tank Battery						
City:	Lewisville	County:	Lafayette County	State:	AR	Direction:	SW	
Filename:	R0011305.JPG	Photo Date:		01/14/2026		Time:	14:14:28	
Photographer:	Kerri McCabe			Witness Name:		Tom McKay		



Description:	Looking SW, this photo shows an overview of the saltwater disposal (SWD) injection well tank battery.		
Latitude:	33°26'36.432" N	Longitude:	93°32'1.302" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Facility/Location:		C12: Arkansas Oil, LLC Midway Smackover Unit Tract 3 Tank Battery						
City:	Lewisville	County:	Lafayette County	State:	AR	Direction:	S	
Filename:	R0011306.JPG	Photo Date:		01/14/2026		Time:	14:15:41	
Photographer:	Kerri McCabe			Witness Name:		Tom McKay		



Description:	Looking S, this photo shows the drainpipe for the SWD injection well tank battery.		
Latitude:	33°26'37.385" N	Longitude:	93°32'2.472" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Facility/Location:		C12: Arkansas Oil, LLC Midway Smackover Unit Tract 3 Tank Battery						
City:	Lewisville	County:	Lafayette County	State:	AR	Direction:	SW	
Filename:	R0011307.JPG	Photo Date:		01/14/2026		Time:	14:18:03	
Photographer:	Kerri McCabe			Witness Name:		Tom McKay		



Description:	Looking SW, this photo shows an overview of the oil storage tank battery (Area 1).		
Latitude:	33°26'37.134" N	Longitude:	93°32'1.469" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Facility/Location:		C12: Arkansas Oil, LLC Midway Smackover Unit Tract 3 Tank Battery						
City:	Lewisville	County:	Lafayette County	State:	AR	Direction:	SW	
Filename:	R0011308.JPG	Photo Date:		01/14/2026		Time:	14:18:44	
Photographer:	Kerri McCabe			Witness Name:		Tom McKay		



Description:	Looking SW, this photo shows the drainpipes for the oil storage tank battery.		
Latitude:	33°26'37.164" N	Longitude:	93°32'0.840" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Facility/Location:		C12: Arkansas Oil, LLC Midway Smackover Unit Tract 3 Tank Battery						
City:	Lewisville	County:	Lafayette County	State:	AR	Direction:	SW	
Filename:	R0011309.JPG	Photo Date:		01/14/2026		Time:	14:20:14	
Photographer:	Kerri McCabe			Witness Name:		Tom McKay		



Description:	Looking SW, this photo shows loose oil inside the oil storage tank battery.		
Latitude:	33°26'37.979" N	Longitude:	93°32'1.530" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Facility/Location:		C12: Arkansas Oil, LLC Midway Smackover Unit Tract 3 Tank Battery						
City:	Lewisville	County:	Lafayette County	State:	AR	Direction:	S	
Filename:	R0011311.JPG	Photo Date:		01/14/2026		Time:	14:24:41	
Photographer:	Kerri McCabe			Witness Name:		Tom McKay		



Description:	Looking S, this photo shows the loading line for the FWKO tank battery without secondary containment.		
Latitude:	33°26'37.999" N	Longitude:	93°32'1.374" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Facility/Location:		C12: Arkansas Oil, LLC Midway Smackover Unit Tract 3 Tank Battery						
City:	Lewisville	County:	Lafayette County	State:	AR	Direction:	WSW	
Filename:	R0011312.JPG	Photo Date:		01/14/2026		Time:	14:25:58	
Photographer:	Kerri McCabe			Witness Name:		Tom McKay		



Description:	Looking WSW, this photo shows an active leak from a pipe inside the FWKO tank battery.		
Latitude:	33°26'39.191" N	Longitude:	93°32'1.038" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Facility/Location:		C12: Arkansas Oil, LLC Midway Smackover Unit Tract 3 Tank Battery						
City:	Lewisville	County:	Lafayette County	State:	AR	Direction:	S	
Filename:	R0011313.JPG	Photo Date:		01/14/2026		Time:	14:30:23	
Photographer:	Kerri McCabe			Witness Name:		Tom McKay		



Description:	Looking S, this photo shows a tank battery with older, bolted tanks.		
Latitude:	33°26'39.797" N	Longitude:	93°32'1.692" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Facility/Location:		C12: Arkansas Oil, LLC Midway Smackover Unit Tract 3 Tank Battery						
City:	Lewisville	County:	Lafayette County	State:	AR	Direction:	S	
Filename:	R0011314.JPG	Photo Date:		01/14/2026		Time:	14:31:20	
Photographer:	Kerri McCabe			Witness Name:		Tom McKay		



Description:	Looking S, this photo shows the interior of the bolted tank battery with a pipe partially disconnected.		
Latitude:	33°26'40.157" N	Longitude:	93°32'1.242" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Facility/Location:		C12: Arkansas Oil, LLC Midway Smackover Unit Tract 3 Tank Battery						
City:	Lewisville	County:	Lafayette County	State:	AR	Direction:	S	
Filename:	R0011315.JPG	Photo Date:		01/14/2026		Time:	14:33:02	
Photographer:	Kerri McCabe			Witness Name:		Tom McKay		



Description:	Looking S, this photo shows a tank that C12: Arkansas Oil, LLC plated (i.e., removed the manway) in preparation for permanent closure.		
Latitude:	33°26'40.139" N	Longitude:	93°32'1.134" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Facility/Location:		C12: Arkansas Oil, LLC Midway Smackover Unit Tract 3 Tank Battery						
City:	Lewisville	County:	Lafayette County	State:	AR	Direction:	SSW	
Filename:	R0011316.JPG	Photo Date:		01/14/2026		Time:	14:33:10	
Photographer:	Kerri McCabe			Witness Name:		Tom McKay		



Description:	Looking SSW, this photo shows sedimentation inside the plated tank that still needs to be removed prior to permanent closure.		
Latitude:	33°26'40.110" N	Longitude:	93°32'1.074" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Facility/Location:		C12: Arkansas Oil, LLC Midway Smackover Unit Tract 3 Tank Battery						
City:	Lewisville	County:	Lafayette County	State:	AR	Direction:	S	
Filename:	R0011318.JPG	Photo Date:		01/14/2026		Time:	14:35:31	
Photographer:	Kerri McCabe			Witness Name:		Tom McKay		



Description:	Looking S, this photo shows an additional view of the removed section of pipe from Photo No. 11.		
Latitude:	33°26'40.043" N	Longitude:	93°32'1.032" W



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Facility/Location:		C12: Arkansas Oil, LLC Midway Smackover Unit Tract 3 Tank Battery						
City:	Lewisville	County:	Lafayette County	State:	AR	Direction:	SW	
Filename:	R0011319.JPG	Photo Date:		01/14/2026		Time:	14:41:47	
Photographer:	Kerri McCabe			Witness Name:		Tom McKay		



Description:	Looking SW, this photo shows a closeup of the tote containing oil that was outside secondary containment from Photo No. 8.		
Latitude:	33°26'38.585" N	Longitude:	93°32'0.479" W