

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	2/24/2020 to 2/25/2020	
Media Program:	Water, Clean Water Act, National Pollutant Discharge Elimination System	
Regulatory Program(s)	Oil and Gas, Produced Water	
Company Name:	Vinland Energy, LLC	
Facility Name:	Bickley Lease	
Facility Physical Location:	34.0585863, -98.8766007	
(city, state, zip code)	Electra, Texas 76360	
Mailing address:	7700 San Felipe St., Ste 480	
(city, state, zip code)	Houston, Texas 77063	
County/Parish:	Wichita County	
Facility Phone Number	940-249-7838	
Facility Contact:	Michael Mersiovsky	EH&S Coordinator
	Michael.Mersiovsky@vinlandenergyllc.com	
FRS Number:	N/A	
Identification/Permit Number:	TXU011246	
Media Identifier Number:	N/A	
NAICS:	21111111	
SIC:	1311	
Personnel participating in inspection:		
Kayla Woods	U.S. EPA, Region 6, ECDWE	Inspector
Jeanne Eckhart	U.S. EPA, Region 6, ECDWE	Inspector
EPA Lead Inspector Signature/Date		4/13/2020
	Kayla Woods	Date
Supervisor Signature/Date		13 APR 2020
	Guy Tidmore	Date

I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Kayla Woods and Jeanne Eckhart arrived at the Vinland Energy, LLC, Bickley Lease at 3:15PM on 2/24/2020 for an unannounced inspection. The scope of the inspection was to determine if the facility was in compliance with the Clean Water Act (CWA), and to identify and document unauthorized discharges of produced wastewater (brine) to a water of the United States. At 5:22pm on 2/24/2020, Chris Vestal, the Production Superintendent, arrived at the facility. EPA representatives temporarily stopped the inspection and held a meeting with Mr. Vestal. EPA inspector Jeanne Eckhart indicated she had credentials she could show Mr. Vestal if he desired. We exchanged contact information with Mr. Vestal and expressed to him our inspection observations at that point in the inspection.

FACILITY DESCRIPTION

This was a manned operational facility with flow analyzers running. There were three produced water storage tanks and four crude oil storage tanks on site. There was active separation occurring at four separation tanks. This facility was previously identified by EPA as RAM Energy Resources, Inc. (Bickley Lease), EPA ID Number: TXU010840.

Section II – OBSERVATIONS

Prior to arriving at the site, Jeanne and I successfully calibrated our field equipment and the YSI Pro 30 Conductivity meter. Inspectors Kayla Woods and Jeanne Eckhart arrived at Long Creek downstream from the Vinland Energy, LLC (Bickley Lease) facility on 02/24/2020 at 3:55PM. I measured a Total Dissolved Solids (TDS) reading of 20,296 milligrams per liter (mg/L) in Photos 1 and 2. I observed erosion along the channel indicative of constant flow in the area. Photo 3 identified the facility's lease as the Bickley Lease. In Photo 4, showed an overview of an active tank battery at the facility with four oil storage tanks and two produced water storage tanks on site. I observed that there was not adequate secondary containment surrounding the tank batteries, along with the berm wall surrounding the facility is low.

In Photos 5 and 6 an open produced water storage tank was observed behind the main tank battery area and showed fluids, including oil sludge on top in the tank. The concrete containment was deteriorated and there was visible staining and salt crystallization all around this open storage tank. In Photo 7, the berm wall surrounding the open produced water storage tank was low in height and inadequate. One of four separators conducting chemical processes were identified in Photo 8. Photo 9 identifies one point of discharge of fluids from a piping juncture. A previous eroded flow path was observed from this area to Long Creek. There was not an active leak occurring from this point at the time of the inspection. Historic salt crystals were identified, along with crystalized hard salts on four out of the five flowlines located north of the main tank battery. A downstream contaminated flow path was observed from the flow lines in Photo 10. The conductivity meter exhibited elevated levels of TDS

measured at 26,852 mg/L in Photo 11. Photo 12 displayed a polluted downstream flow path along the surface towards Long Creek.

Photo 13 presented extremely elevated TDS levels at the point of entry (Photo 14) into Long Creek downstream at 117,335mg/L on the YSI Pro 30 conductivity meter. There was not an active discharge identified going into Long Creek during the inspection. I observed upstream of the facility on Long Creek that the vegetation was dead and salt crystallization was seen. Photo 15 shows Long Creek split approximately 100' downstream from the point of entry, and then re-merge. Photos 16 and 17 show another overview of the contaminant flow path from the facility toward the point of entry on Long Creek. After these photos were taken and our observations were documented we walked back upstream on Long Creek toward the facility, past the open storage tank. From Photo 18, The YSI Pro 30 conductivity meter measured elevated TDS levels of 56,311 mg/L upstream on Long Creek from the facility and observed point of entry. At this time, we began packing equipment to leave the facility and continue the inspection the next day. As we were driving towards the gate, we met Chris Vestal, Production Supervisor for Vinland Energy. We briefly advised Mr. Vestal of our observations before leaving the facility.

At 8:00 am on 2/25/20, we restarted the inspection. In Photos 19, I observed at this location upstream on Long Creek from the Bickley Lease: no flow in the stream observed, no active identified discharge, and no vegetation. There was an active lease very close to this upstream channel. In Photo 20, the YSI Pro 30 conductivity meter showed elevated TDS levels of 1,359 mg/L upstream from the point of entry. This is the furthest point upstream that we measured. Inspectors Jeanne Eckhart and Kayla Woods walked across the road to go back downstream of Long Creek to find elevated levels of TDS again at 101,432 mg/L in Photos 21 and 22. I observed channel definition in Long Creek and dead vegetation at this location. Continuing upstream again, the YSI Pro 30 conductivity meter showed elevated TDS levels of 48,744 mg/L upstream in photo 23. There were animal tracks nearby the pooled-up area in Long Creek where 48,744 mg/L TDS levels were found. Water flow at this location was not connected to downstream surface flow in Long Creek. We observed two other operators in the area near where these elevated TDS levels were identified.

Photo 25 was taken further upstream of Long Creek and southwest of 1,359 mg/L TDS. The TDS levels were 999 mg/L. We observed livestock grazing in this area and no aquatic life in the pond. We drove downstream along Long Creek past the Bickley lease and the 117,388 mg/L TDS measurement. The TDS levels Northeast of the Bickley Lease were 11,604 mg/L in Photo 26. At this location, Photo 27 exposed well-defined channel banks and bed rock observed in the stream. There were animal tracks observed again, however I did not observe any aquatic life in Long Creek during the inspection. The creek was flowing downstream, or northward, during the inspection. TDS levels were 11,513 mg/L in Photo 28. I noticed some high watermarks downstream in Photo 29. I observed large culverts in place on Long Creek at the road crossing indicating the creek had consistently been flowing over time. After this measurement, this concluded our CWA inspection at the Bickley Lease on 2/25/2020 at 10:08AM.

Section III – AREAS OF CONCERN

There are expressed areas of concern which included the open produced water storage tank with its deteriorated and stained concrete containment with visible oil sludge seen at the top (Photos 5, 6, and 7). Additionally, this site had no secondary containment surrounding the tank batteries, with low berm walls (Photos 5, 6, and 7). There were two instances of two elevated levels of Total Dissolved Solids (TDS) over 100,000 mg/L (Photos 13 and 22), particularly in Photo 13 and 14 which showed the point of entry. There was not an active discharge at this time. EPA Region 6 inspectors Kayla Woods and Jeanne Eckhart conducted a mid-inspection conference at Vinland Energy, LLC at 5:22pm on 2/24/2020 for the inspection with Chris Vestal, the Production Superintendent, who noticed EPA inspectors on site as he was driving in towards the facility. During the conference, Kayla Woods and Jeanne Eckhart reviewed the areas of concern related to the Clean Water Act that they had identified up to that point with Chris Vestal. A final closing conference was not conducted, as Mr. Vestal was not present.

Section IV – FOLLOW UP

A follow-up call took place between the US EPA Region 6 inspectors Kayla Woods and Jeanne Eckhart and Michael Mersiovsky, the EH&S Manager of Vinland Energy, LLC (Bickley Lease) on March 2, 2020 after exiting the facility on 2/25/2020. Kayla Woods and Jeanne Eckhart addressed the areas of concern to Michael Mersiovsky, who indicated he would further investigate the elevated levels of TDS found in Long Creek and respond appropriately. This facility will be referred to the Texas Railroad Commission and US EPA Region 6 will conduct a follow-up inspection.

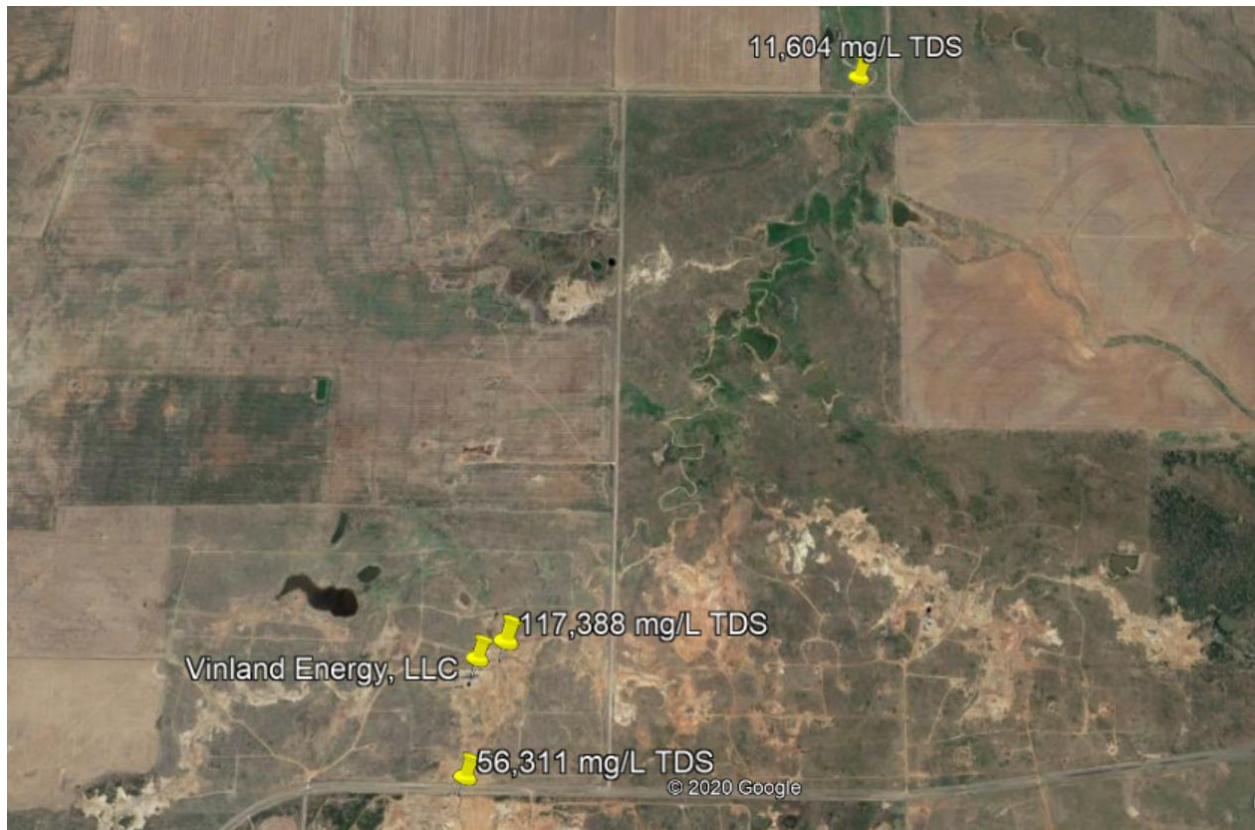
Section V – LIST OF APPENDICES

Appendix 1-- Google Earth Pro Maps of Vinland Energy, LLC (Bickley Lease) – 3 photos

Appendix 2-- Photo Log – 29 photos taken 2/24/2020 to 2/25/2020

Appendix 1

Google Earth Pro Maps of Vinland Energy, LLC (Bickley Lease)





Appendix 2

Photographic Log (29 photos)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 1

34.0610836N, -98.8725634W		
City: Electra	County: Wichita	State: Texas



Photo File Name: Photo 1 (DSCN5122.JPG)

Orientation: West

Date of Photo: 2/24/2020

Time of Photo: 3:00pm

Latitude: 34.0610836N

Longitude: -98.8725634W

Photographer: Jeanne Eckhart

Description: This was an overview of Long Creek downstream from the facility in the distance. I observed erosion along the channel indicative of constant flow in the area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

34.0610836N, -98.8725634W		
City: Electra	County: Wichita	State: Texas



Photo File Name: Photo 2 (DSCN5123.JPG)

Orientation: West

Date of Photo: 2/24/2020

Time of Photo: 3:02pm

Latitude: 34.0610836N

Longitude: -98.8725634W

Photographer: Jeanne Eckhart

Description: The YSI Pro 30 conductivity meter showed elevated TDS levels of 20,296 mg/L.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

34.0585416N, -98.8765196W		
City: Electra	County: Wichita	State: Texas



Photo File Name: Photo 3 (DSCN5126.JPG)

Orientation: South

Date of Photo: 2/24/2020

Time of Photo: 3:33pm

Latitude: 34.0585416N

Longitude: -98.8765196W

Photographer: Jeanne Eckhart

Description: This photo shows the sign located at Vinland Energy, LLC facility on the Bickley Lease.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

34.0585416N, -98.8765196W		
City: Electra	County: Wichita	State: Texas



Photo File Name: Photo 4 (DSCN5127.JPG)

Orientation: South

Date of Photo: 2/24/2020

Time of Photo: 3:34pm

Latitude: 34.0585416N

Longitude: -98.8765196W

Photographer: Jeanne Eckhart

Description: In Photo 4, showed an overview of an active tank battery at the facility with four oil storage tanks and two produced water storage tanks on site. I observed that there was not adequate secondary containment surrounding the tank batteries, along with the berm wall surrounding the facility is low.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

34.0585416N, -98.8765196W		
City: Electra	County: Wichita	State: Texas



Photo File Name: Photo 5 (DSCN5135.JPG)

Orientation: East

Date of Photo: 2/24/2020

Time of Photo: 3:43pm

Latitude: 34.0585416N

Longitude: -98.8765196W

Photographer: Jeanne Eckhart

Description: An open produced water storage tank was located behind the main tank battery and had fluids in it, including oil sludge on top. The concrete containment was falling apart which showed staining and salt crystallization outside of the containment area and flowing towards Long Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

34.0585416N, -98.8765196W		
City: Electra	County: Wichita	State: Texas



Photo File Name: Photo 6 (DSCN5136.JPG)

Orientation: West

Date of Photo: 2/24/2020

Time of Photo: 3:44pm

Latitude: 34.0585416N

Longitude: -98.8765196W

Photographer: Jeanne Eckhart

Description: Another photo showing the damage and staining of this open storage tank from the other side.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

34.0585416N, -98.8765196W		
City: Electra	County: Wichita	State: Texas



Photo File Name: Photo 7 (DSCN5137.JPG)

Orientation: East

Date of Photo: 2/24/2020

Time of Photo: 3:47pm

Latitude: 34.0585416N

Longitude: -98.8765196W

Photographer: Jeanne Eckhart

Description: This open produced water storage tank was inadequate and deteriorating at the tank walls. The berm wall surrounding the open produced water storage tank was low in height and inadequate as well. There was surface damage outside of the secondary containment, including salt crystallization and eroded flow paths indicating previous flow towards Long Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

34.0585194N, -98.8773055W		
City: Electra	County: Wichita	State: Texas



Photo File Name: Photo 8 (DSCN5138.JPG)

Orientation: South

Date of Photo: 2/24/2020

Time of Photo: 3:48pm

Latitude: 34.0585194N

Longitude: -98.8773055W

Photographer: Jeanne Eckhart

Description: This image shows Vinland Energy, LLC W.B. Honaker Tank Battery sign located on the Bickley Lease. This image shows 1 of the 4 separators on site that were connected to the main tank battery with flow lines.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

34.0587685N, -98.8764837W		
City: Electra	County: Wichita	State: Texas



Photo File Name: Photo 9 (DSCN5141.JPG)

Orientation: South

Date of Photo: 2/24/2020

Time of Photo: 3:55pm

Latitude: 34.0587685N

Longitude: -98.8764837W

Photographer: Jeanne Eckhart

Description: This image identifies one point of discharge of fluids from a piping juncture. A previous eroded flow path was observed from this area to Long Creek. There was not an active leak occurring from this point at the time of the inspection. Historic salt crystals were identified, along with crystalized hard salts on four out of the five flowlines located north of the main tank battery.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

34.0587685N, -98.8764837W		
City: Electra	County: Wichita	State: Texas



Photo File Name: Photo 10 (DSCN5145.JPG)

Orientation: Northeast

Date of Photo: 2/24/2020

Time of Photo: 3:55pm

Latitude: 34.0587685N

Longitude: -98.8764837W

Photographer: Jeanne Eckhart

Description: This photo shows the beginning of the contaminated flow path downstream towards Long Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

34.0587685N, -98.8764837W		
City: Electra	County: Wichita	State: Texas



Photo File Name: Photo 11 (DSCN5147.JPG)

Orientation: Northeast

Date of Photo: 2/24/2020

Time of Photo: 3:57pm

Latitude: 34.0587685N

Longitude: -98.8764837W

Photographer: Jeanne Eckhart

Description: The YSI Pro 30 conductivity meter showed elevated levels of TDS in the contaminated flow path that measured 26,852 mg/L.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

34.0587685N, -98.8764837W		
City: Electra	County: Wichita	State: Texas



Photo File Name: Photo 12 (DSCN5148.JPG)

Orientation: Northeast

Date of Photo: 2/24/2020

Time of Photo: 11:02 am

Latitude: 34.0587685N

Longitude: -98.8764837W

Photographer: Jeanne Eckhart

Description: A photo of the polluted downstream flow path along the surface towards Long Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

34.0587685N, -98.8764837W		
City: Electra	County: Wichita	State: Texas



Photo File Name: Photo 13 (DSCN5151.JPG)

Orientation: Northeast

Date of Photo: 2/24/2020

Time of Photo: 4:03pm

Latitude: 34.0587685N

Longitude: -98.8764837W

Photographer: Jeanne Eckhart

Description: The YSI Pro 30 conductivity meter showed elevated TDS levels of 117,335 mg/L at the point of entry of the contaminants into Long Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

34.0589693N, -98.8758058W		
City: Electra	County: Wichita	State: Texas



Photo File Name: Photo 14 (DSCN5153.JPG)

Orientation: East

Date of Photo: 2/24/2020

Time of Photo: 4:04pm

Latitude: 34.0589693N

Longitude: -98.8758058W

Photographer: Jeanne Eckhart

Description: This image shows the downstream point of entry on Long Creek. There was not an active discharge identified going into Long Creek during the inspection. I observed upstream of the facility on Long Creek that the vegetation was dead and salt crystallization was seen.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

34.0589693N, -98.8758058W		
City: Electra	County: Wichita	State: Texas



Photo File Name: Photo 15 (DSCN5154.JPG)

Orientation: East

Date of Photo: 2/24/2020

Time of Photo: 4:04pm

Latitude: 34.0589693N

Longitude: -98.8758058W

Photographer: Jeanne Eckhart

Description: Photo 15 shows Long Creek split approximately 100' downstream from the point of entry, and then re-merge.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 16

34.0587685N, -98.8764837W		
City: Electra	County: Wichita	State: Texas



Photo File Name: Photo 16 (DSCN5149.JPG)

Orientation: West

Date of Photo: 2/24/2020

Time of Photo: 3:57pm

Latitude: 34.0587685N

Longitude: -98.8764837W

Photographer: Jeanne Eckhart

Description: This image shows an overview of the contaminated flow path from the facility toward the point of entry on Long Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 17

34.0589693N, -98.8758058W		
City: Electra	County: Wichita	State: Texas



Photo File Name: Photo 17 (DSCN5152.JPG)

Orientation: West

Date of Photo: 2/24/2020

Time of Photo: 4:04pm

Latitude: 34.0589693N

Longitude: -98.8758058W

Photographer: Jeanne Eckhart

Description: This image shows another overview of the contaminant flow path from the facility toward the point of entry on Long Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 18

34.0557850N, -98.8768334W		
City: Electra	County: Wichita	State: Texas



Photo File Name: Photo 18 (DSCN5160.JPG)

Orientation: South

Date of Photo: 2/24/2020

Time of Photo: 4:45pm

Latitude: 34.0557850N

Longitude: -98.8768334W

Photographer: Jeanne Eckhart

Description: The YSI Pro 30 conductivity meter measured elevated TDS levels of 56,311 mg/L upstream on Long Creek from the facility and observed point of entry.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 19

34.0443383N, -98.8791613W		
City: Electra	County: Wichita	State: Texas



Photo File Name: Photo 19 (DSCN5162.JPG)

Orientation: South

Date of Photo: 2/25/2020

Time of Photo: 8:01am

Latitude: 34.0443383N

Longitude: -98.8791613W

Photographer: Jeanne Eckhart

Description: I observed at this location upstream on Long Creek from the Bickley Lease: no flow in the stream observed, no active identified discharge, and no vegetation. There was an active lease very close to this upstream channel.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

34.0443383N, -98.8791613W		
City: Electra	County: Wichita	State: Texas



Photo File Name: Photo 20 (DSCN5161.JPG)

Orientation: South

Date of Photo: 2/25/2020

Time of Photo: 8:01am

Latitude: 34.0443383N

Longitude: -98.8791613W

Photographer: Jeanne Eckhart

Description: The YSI Pro 30 conductivity meter showed elevated TDS levels of 1,359 mg/L upstream from the point of entry. This is the furthest point upstream that we measured.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 21

34.044492N, -98.879161W		
City: Electra	County: Wichita	State: Texas



Photo File Name: Photo 21 (DSCN5168.JPG)

Orientation: South

Date of Photo: 2/25/2020

Time of Photo: 8:03am

Latitude: 34.044492N

Longitude: -98.879161W

Photographer: Jeanne Eckhart

Description: This photo was taken upstream of the point of entry and downstream from the 1,359 mg/L TDS reading. I observed channel definition in Long Creek and dead vegetation at this location.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 22

34.0610836N, -98.8725634W		
City: Electra	County: Wichita	State: Texas



Photo File Name: Photo 22 (DSCN5168.JPG)

Orientation: South

Date of Photo: 2/25/2020

Time of Photo: 8:03am

Latitude: 34.044492N

Longitude: -98.879161W

Photographer: Jeanne Eckhart

Description: A YSI Pro 30 conductivity meter measured elevated TDS of 101,432 mg/L from Photo 21's location.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 23

34.044386N, -98.8777809W		
City: Electra	County: Wichita	State: Texas



Photo File Name: Photo 23 (DSCN5169.JPG)

Orientation: North

Date of Photo: 2/25/2020

Time of Photo: 8:07am

Latitude: 34.044386N

Longitude: -98.8777809W

Photographer: Jeanne Eckhart

Description: The YSI Pro 30 conductivity meter showed elevated TDS levels of 48,744 mg/L upstream.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 24

34.044386N, -98.8777809W		
City: Electra	County: Wichita	State: Texas



Photo File Name: Photo 24 (DSCN5172.JPG)

Orientation: North

Date of Photo: 2/25/2020

Time of Photo: 8:07am

Latitude: 34.044386N

Longitude: -98.8777809W

Photographer: Jeanne Eckhart

Description: There were animal tracks nearby the pooled-up area in Long Creek where 48,744 mg/L TDS levels were found. Water flow at this location was not connected to downstream surface flow in Long Creek. We observed two other operators in the area near where these elevated TDS levels were identified.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 25

34.0436101N, -98.8808339W		
City: Electra	County: Wichita	State: Texas



Photo File Name: Photo 25 (DSCN5177.JPG)

Orientation: East

Date of Photo: 2/25/2020

Time of Photo: 8:35am

Latitude: 34.0436101N

Longitude: -98.8808339W

Photographer: Jeanne Eckhart

Description: There was a small pond at side of Long Creek that was not connected to the creek. This photo was taken further upstream of the creek at this pond. The TDS levels measured 999 mg/L. We observed livestock grazing in this area and no aquatic life in the pond.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 26

34.0737578N, -98.8650595W		
City: Electra	County: Wichita	State: Texas



Photo File Name: Photo 26 (DSCN5180.JPG)

Orientation: South

Date of Photo: 2/25/2020

Time of Photo: 8:52am

Latitude: 34.0737578N

Longitude: -98.8650595W

Photographer: Kayla Woods

Description: We arrived downstream along Long Creek past the Bickley lease and the 117,388 mg/L TDS measurement. The TDS levels were 11,604 mg/L. There were well-defined channel banks and bed rock observed in the stream. I observed large culverts in place on Long Creek at the road crossing indicating the creek had consistent flow over time.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 27

34.0737578N, -98.8650595W		
City: Electra	County: Wichita	State: Texas



Photo File Name: Photo 27 (DSCN5180.JPG)

Orientation: South

Date of Photo: 2/25/2020

Time of Photo: 8:52am

Latitude: 34.0737578N

Longitude: -98.8650595W

Photographer: Kayla Woods

Description: The creek was steadily flowing. There was a well-defined channel a bed/bank observed. There were animal tracks observed on creek channel side.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 28

34.0737578N, -98.8650595W		
City: Electra	County: Wichita	State: Texas



Photo File Name: Photo 28 (DSCN5184.JPG)

Orientation: Northeast

Date of Photo: 2/25/2020

Time of Photo: 8:57am

Latitude: 34.0737578N

Longitude: -98.8650595W

Photographer: Kayla Woods

Description: The creek was flowing downstream during the inspection. TDS levels were 11,513 mg/L.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 29

34.0737578N, -98.8650595W		
City: Electra	County: Wichita	State: Texas



Photo File Name: Photo 29 (DSCN5189.JPG)

Orientation: Northeast

Date of Photo: 2/25/2020

Time of Photo: 8:59am

Latitude: 34.0737578N

Longitude: -98.8650595W

Photographer: Kayla Woods

Description: There was a well-defined channel a banks and bed rocks in the stream. Large culverts in place on creek at the road crossing. Some high watermarks downstream were observed.