

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	09/16/2022	
Media Program:	Water	
Regulatory Program(s)	Clean Water Act – National Pollution Discharge Elimination System (Brine)	
Company Name:	Northcote Cleveland LLC	
Facility Name:	Osage B Lease	
Facility Physical Location:	Latitude: 36.259597, Longitude: -96.225672	
(city, state, zip code)	Prue, Oklahoma, 74060	
Mailing address:	701 S Eighth St	
(city, state, zip code)	Ponca City, Oklahoma, 74601	
County/Parish:	Osage County	
Facility Phone Number	580-304-1193	
Facility Contact:	Cody Mather	Owner/Operator
	Cody_mather@hotmail.com	
FRS Number:	n/a	
Identification/Permit Number:	OKU000856	
Media Identifier Number:	n/a	
NAICS:	211111	
SIC:	1311	
Personnel participating in inspection:		
Matthew Allen	EPA, Region 6ECDW	Inspector
EPA Lead Inspector Signature/Date	MATTHEW ALLEN Digitally signed by MATTHEW ALLEN DN: c=US, o=U.S. Government, ou=Environmental Protection Agency, cn=MATTHEW ALLEN, 0.9.2342.19200300.100.1.1=68001004162907 Date: 2022.10.26 16:49:10 -05'00'	Date
	Matthew Allen	
Supervisor Signature/Date	JEANNE ECKHART Digitally signed by JEANNE ECKHART Date: 2022.10.27 13:42:33 -05'00'	Date
	Jeanne Eckhart (<i>acting</i>)	

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector Matthew Allen arrived at the Northcote Cleveland, LLC, Osage B Lease (EPA ID No. OKU000856), at 10:15 AM on 09/16/2022 for an announced inspection. This was a follow up inspection, the original spill inspection was conducted by EPA Inspector, Matthew Allen on 09/03/2022 in response to a spill notification (NRC# 1346621) received from Bureau of Indian Affairs (BIA), Osage Agency, inspector, Jeff McGuire. The inspection was conducted by the authority of the Clean Water Act to determine compliance with Environmental Protection Agency (EPA) regulations. There were no other federal, tribal, state, or local agency representatives present at the time of the inspection.

FACILITY DESCRIPTION

EPA conducted a follow up inspection on the Northcote Cleveland, LLC, Osage B Lease. The spill originated from a 2-inch diameter poly production flowline which transported produced water (oil and saltwater) from the producing well to the oil separation/storage facility (tank battery). The Osage B Lease was located north of New Prue Road, east of the confluence of Mud Creek into Keystone Lake, in Osage County, Oklahoma.

Section II - OBSERVATIONS

See Appendix 1 (photo log) which is attached to this narrative report for additional visual, descriptive and location information for the photos referenced in observations section below.

At the release point, I observed a ditch/trench where the repaired flowline was being buried to prevent recurrence of the spill event, see photo No. 1. I observed the flowpath from the release point to the point of entry (POE), the flowpath had been disturbed by heavy equipment during other cleanup activities, but residual salt was visible on the surface of the soil and the flowpath had not been cleaned or remediated at the time of the inspection (see photo No. 2)

I observed significant soil and rock fill into the main channel of the impacted tributary this soil fill was a result of the banks being pulled into the main channel of the tributary. I also observed oil-stained soil and rocks present in the “fill” material (photo’s No. 3, 4, 6, 7, 8, 9, 11, 17, 18).

I observed a row of oil-stained rocks and soil which had been removed from the tributary and piled approximately 15 feet south of tributary. (See photo No. 10).

I observed a small section of the impacted tributary where oil staining and residual salt were present, evidence that flushing activities had not been conducted, or inadequate flushing had occurred. (Photos No. 12, 13, 15)

I observed the location of the most upstream temporary containment dam. At the time of the inspection, the dam had been partially removed, see photo No 14.

As the inspection continued downstream, I observed additional areas where the banks of the tributary were pulled into the main channel resulting in contaminated soil and rocks partially filling the channel. (Photos No. 17 and 18).

I observed two areas where the original main channel of the tributary had been filled in and a new channel had been dug. See photos No. 19 and No. 20 for additional description and location information.

I observed multiple locations where soil was dug from the banks of the tributary and placed in the bed of the tributary to cover oil-stained areas. Evidence of these observations can be seen in photos No. 21, 22, 23, 24, 25, 26, and 27.

I observed a final area along the impacted tributary where “clean B” industrial absorbent had been applied to oil and oil stains at the final pool of water along the tributary. See photo No. 28.

I observed oil-stained rocks along the base of New Prue Road as the road crossed Mud Creek/Keystone Lake. There was much less staining present than during the previous two inspections. I did observe a film on the water, but it was not oil sheen. See photo’s No. 29, 30, and 31.

I observed a large section of shoreline along Mud Creek/Keystone Lake which had previously been impacted with oil and oil-staining. At the time of the inspection, the area was clean with no evidence of oil or oil stains. See photo No. 32.

Section III – AREAS OF CONCERN

There were multiple areas along the impacted tributary where oil staining and salt crystals present in the main channel indicated inadequate flushing operations to remove contamination from the impacted tributary. Additional clean up should occur to remove the residual salt and oil staining.

Much of the tributary was “filled” with soil and rocks which was pulled in from the banks. Some of this fill material itself was contaminated with oil and brine. The fill material is covering areas where residual salt and oil are still present in the main channel of the tributary. The fill material should be removed from the main channel, and the residual salt and oil stains should be removed from the impacted tributary.

Section IV – FOLLOW UP

EPA inspector Matthew Allen conducted a follow-up call with Cody Mather 09/22/2022 at 11:21 AM. The call lasted 15 minutes. I voiced my areas of concern from the inspection listed, Mr. Mather stated much of the fill was a result of efforts to remove buried and partially buried, abandoned flowlines along the impacted tributary. Mr. Mather stated he had been on contact with the landowner and was working to address their concerns during the clean-up effort. Mr. Mather stated there was a meeting between himself and the landowner, which was planned to occur the week of September 26, I requested to be informed and invited to that meeting, but never heard back from Mr. Mather.

EPA will continue to perform follow-up inspections at the facility until satisfactory results are observed.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 32 photos taken 09/16/2022

Appendix 1

Photograph Log 32 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0767

Orientation: S

Date of Photo: 09/16/2022

Time of Photo: 10:19 AM

Latitude: 36.259597

Longitude: -96.225672

Photographer: Matthew Allen

Description: This was the release point of the spill. A trench had been dug to bury the repaired flowline to prevent recurrence of the spill.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0768

Orientation: S

Date of Photo: 09/16/2022

Time of Photo: 10:22 AM

Latitude: 36.259467

Longitude: -96.225801

Photographer: Matthew Allen

Description: This was the flowpath of the spill, the dirt had been disturbed by equipment moving around the area but the flowpath had not yet been cleaned or remediated at the time of inspection.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0771

Orientation: SW

Date of Photo: 09/16/2022

Time of Photo: 10:26 AM

Latitude: 36.259401

Longitude: -96.226191

Photographer: Matthew Allen

Description: This was the point of entry (POE) into the impacted tributary. The main channel had been filled with soil.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0772

Orientation: SW

Date of Photo: 09/16/2022

Time of Photo: 10:26 AM

Latitude: 36.259401

Longitude: -96.226191

Photographer: Matthew Allen

Description: This was a view looking across the POE with a downstream view, the main channel had been filled with soil and the banks had been reshaped with heavy equipment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0773

Orientation: E

Date of Photo: 09/16/2022

Time of Photo: 10:26 AM

Latitude: 36.259401

Longitude: -96.226191

Photographer: Matthew Allen

Description: This was a view from the POE looking upstream to an area not impacted by the spill.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0774

Orientation: SW

Date of Photo: 09/16/2022

Time of Photo: 10:31 AM

Latitude: 36.259367

Longitude: -96.226388

Photographer: Matthew Allen

Description: This was a view of the altered and filled channel of the impacted tributary, approximately 150 feet downstream from the POE.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0775

Orientation: SW

Date of Photo: 09/16/2022

Time of Photo: 10:33 AM

Latitude: 36.259580

Longitude: -96.226488

Photographer: Matthew Allen

Description: This was the impacted tributary showing soil and rock fill in the main channel of the tributary. Oil-stained rocks were still present in the tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0776

Orientation: n/a

Date of Photo: 09/16/2022

Time of Photo: 10:35 AM

Latitude: 36.259640

Longitude: -96.226812

Photographer: Matthew Allen

Description: This was a photo of oil-stained rocks and soil in the main channel of the impacted tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0777

Orientation: SW

Date of Photo: 09/16/2022

Time of Photo: 10:36 AM

Latitude: 36.259783

Longitude: -96.226893

Photographer: Matthew Allen

Description: This was a photo along a section of the impacted tributary showing soil and rock fill in the main channel.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0778

Orientation: SW

Date of Photo: 09/16/2022

Time of Photo: 10:37

Latitude: 36.259783

Longitude: -96.226893

Photographer: Matthew Allen

Description: This was a photo showing impacted soil and rocks which had been removed from the channel and banks of the impacted tributary. The soil and rocks were in a row approximately 15 feet south of the tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0779

Orientation: n/a

Date of Photo: 09/16/2022

Time of Photo: 10:38 AM

Latitude: 36.260011

Longitude: -96.227187

Photographer: Matthew Allen

Description: This was a photo of oil impacted soil and rock in the main channel of the tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0780

Orientation: SW

Date of Photo: 09/16/2022

Time of Photo: 10:40 AM

Latitude: 36.260173

Longitude: -96.227318

Photographer: Matthew Allen

Description: This was an area of the impacted tributary which had not been impacted by the soil fill. This section of the tributary had not been flushed to remove residual brine and oil stains were still present along the channel.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0781

Orientation: SW

Date of Photo: 09/16/2022

Time of Photo: 10:41 AM

Latitude: 36.260138

Longitude: -96.227606

Photographer: Matthew Allen

Description: This was a photo of 2 rows of rocks placed in/across the main channel of the impacted tributary. Oil stains and residual brine impacts were captured in the photo along the area between the two rows of rocks.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0782

Orientation: N

Date of Photo: 09/16/2022

Time of Photo: 10:42 AM

Latitude: 36.260138

Longitude: -96.277606

Photographer: Matthew Allen

Description: This was the location of the most upstream temporary containment dam. The dam had been partially removed at the time of the inspection.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0783

Orientation: SW

Date of Photo: 09/16/2022

Time of Photo: 10:44 AM

Latitude: 36.260138

Longitude: -96.227606

Photographer: Matthew Allen

Description: This was a closeup view of the oil stains and residual brine impacts from photo No. 13.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0784

Orientation: S

Date of Photo: 09/16/2022

Time of Photo: 10:45 AM

Latitude: 36.260156

Longitude: -96.227791

Photographer: Matthew Allen

Description: This was an area along the impacted tributary where the banks had not been altered during cleanup activities.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0785

Orientation: SW

Date of Photo: 09/16/2022

Time of Photo: 10:46 AM

Latitude: 36.260156

Longitude: -96.227791

Photographer: Matthew Allen

Description: This was an area where the banks of the tributary had been pulled into the main channel.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0787

Orientation: S

Date of Photo: 09/16/2022

Time of Photo: 10:49 AM

Latitude: 36.260427

Longitude: -96.228432

Photographer: Matthew Allen

Description: This was a photo of oil-stained rocks and soil filling the bed of the impacted tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0788

Orientation: S

Date of Photo: 09/16/2022

Time of Photo: 10:52 AM

Latitude: 36.261184

Longitude: -96.229429

Photographer: Matthew Allen

Description: This was an area where the stream had been filled with dirt and a new channel was dug along the north edge of the fill. The main channel was moved to the north by the operator to provide better access to a nearby oil well location.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0789

Orientation: S

Date of Photo: 09/16/2022

Time of Photo: 10:54 AM

Latitude: 36.261469

Longitude: -96.229938

Photographer: Matthew Allen

Description: This was an area along a sharp bend in the tributary where the original oil and brine impacted channel was buried and a new channel was dug approximately 10 feet from the original channel.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 21

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0790

Orientation: SW

Date of Photo: 09/16/2022

Time of Photo: 10:56 AM

Latitude: 36.261689

Longitude: -96.229998

Photographer: Matthew Allen

Description: This was an area where oil-stained rocks were still present in the channel. Dirt had been removed from the south bank of the tributary and placed in the channel to cover additional oil staining on the rock bed of the tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 22

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0791

Orientation: S

Date of Photo: 09/16/2022

Time of Photo: 10:57

Latitude: 36.261772

Longitude: -96.230206

Photographer: Matthew Allen

Description: This was an area where dirt was removed from the bank of the tributary and placed in the bed of the tributary to cover oil-stained rock.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 23

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0792

Orientation: SW

Date of Photo: 09/16/2022

Time of Photo: 10:59 AM

Latitude: 36.261874

Longitude: -96.230564

Photographer: Matthew Allen

Description: This was an overview of an area where dirt was removed from the banks and placed in the bed to cover oil stains.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 24

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0793

Orientation: SW

Date of Photo: 09/16/2022

Time of Photo: 11:01 AM

Latitude: 36.261913

Longitude: -96.230622

Photographer: Matthew Allen

Description: This was a closeup view of the dirt covering oil stains along the bed of the tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 25

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0794

Orientation: SE

Date of Photo: 09/16/2022

Time of Photo: 11:02 AM

Latitude: 36.261913

Longitude: -96.230622

Photographer: Matthew Allen

Description: This is a portion of the bank where dirt was removed, then placed into the tributary bed to cover the remaining oil stains.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 26

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0795

Orientation: NE

Date of Photo: 09/16/2022

Time of Photo: 11:04 AM

Latitude: 36.262381

Longitude: -96.231289

Photographer: Matthew Allen

Description: This was an area where dirt was pulled from the banks and placed in the bed to cover the oil-stained bed of the tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 27

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0796

Orientation: SW

Date of Photo: 09/16/2022

Time of Photo: 11:04 AM

Latitude: 36.262381

Longitude: -96.231289

Photographer: Matthew Allen

Description: This was a photo where soil was removed from the banks and placed in the bed to cover oil staining.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 28

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0797

Orientation: S

Date of Photo: 09/16/2022

Time of Photo: 11:08 AM

Latitude: 36.262091

Longitude: -96.232319

Photographer: Matthew Allen

Description: This was an area along the impacted tributary where "clean B" industrial absorbent had been applied to oil and oil stains.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 29

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0798

Orientation: n/a

Date of Photo: 09/16/2022

Time of Photo: 11:40 AM

Latitude: 36.258157

Longitude: -96.232319

Photographer: Matthew Allen

Description: This was the "rip rap" along New Prue Road, there was some oil staining present on the rocks but much less staining than during the two previous inspections. The film on the water was not oil sheen, when disturbed, the film remained fractured, evidence that it was not oil.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 30

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0799

Orientation: n/a

Date of Photo: 09/16/2022

Time of Photo: 11:41 AM

Latitude: 36.258141

Longitude: -96.232569

Photographer: Matthew Allen

Description: This was oil-stained rip rap along New Prue Road.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 31

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0800

Orientation: W

Date of Photo: 09/16/2022

Time of Photo: 11:43 AM

Latitude: 36.258130

Longitude: -96.232778

Photographer: Matthew Allen

Description: This was oil-stained rocks along the base of New Prue Road.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 32

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0801

Orientation: NW

Date of Photo: 09/16/2022

Time of Photo: 11:44 AM

Latitude: 36.258165

Longitude: -96.233004

Photographer: Matthew Allen

Description: This was an area of shoreline which had obvious oil and oil staining during previous inspections. At the time of this inspection, the area was clean and free of oil and oil stains.