

Region 6 Compliance Assurance and Enforcement Division

INSPECTION REPORT

Inspection Date(s):	04/09/2015		
Media:	Water		
Regulatory Program(s)	CWA-308		
Company Name:	John Sinclair Production LLC		
Facility Name:	T.D. Murphy #3-B		
Facility Physical Location:	SE/4, Sec. 7, T 16 S, R 15 W (33.3418, -92.6910)		
(city, state, zip code)	El Dorado, AR 71730		
Mailing address:	400 East 14 th		
(city, state, zip code)	El Dorado, AR 71730		
County/Parish:	Union County		
Facility Contact:	John Sinclair	Owner	
	John.sinclair@lycusltd.com		
FRS Number:			
Identification/Permit Number:			
Media Number:	ARU001161		
NAICS:	21111		
SIC:	1311		
Personnel participating in inspection:			
Kent W. Sanborn	6EN-WR	Environmental Engineer	918.557.1615
EPA Lead Inspector			
Signature/Date	{Inspector name}		Date
Supervisor			
Signature/Date	{Supervisor name}		Date

Section I - INTRODUCTION

PURPOSE OF THE INSPECTION

The purpose of the inspection was to determine if the facility was in compliance with Section 301 of the Clean Water Act (CWA) and to identify and document discharges to waters of the United States. The Inspection was conducted under the authority of Section 308 of the CWA.

FACILITY DESCRIPTION

The site is an unmanned brine disposal site located east of Smackover, Arkansas. The site consists of a brine storage tank and an injection well. Brine is separated from oil production and is transferred to the facility for disposal into the injection well. The facility is actively receiving fluids.

Section II – OBSERVATIONS

I arrived at the facility location 33.23418N, -92.6910W and observed the facility had discharged brine to a nearby marsh and tributary. Photo 1 shows the brine disposal facility responsible for the discharge. Photo 2 shows the facility sign posted at the site. Photo 3 shows the dirt secondary containment area used at the site. A brine discharge overflowed the berm and ran eastward into the marsh and the tributary. Photo 4 shows the oil staining left behind after the discharge. Dead vegetation and oil staining was evident along the path to the marsh (Photo 5). Photo 6 shows the discharge point of entry into the marsh and tributary. Photo 7 shows oil and brine staining is still present at the entry point. Photo 8 shows a YSI meter reading of 21,400 parts per million Total Soluble Salts (TSS) at the entry point. A reverse angle view is shown in Photo 9 of the pathway back to the marsh. Photo 10 is the same marsh and tributary about ¼ mile east of the entry point. The water is rust colored and is void of any aquatic life. Photo 11 shows a YSI meter reading of 14,000 ppm TSS in the rusty, lifeless tributary. Photo 12 shows another section of the same tributary system farther downstream. This smaller tributary flows to the north and is identified on the topo map as a tributary of Smackover Creek. Photo 13 shows a YSI meter reading of 14,000 ppm TSS in this smaller tributary. Photo 14 shows the marsh upstream in the unaffected area of the discharge. Photo 15 shows a YSI meter reading there of only 1,500 ppm TSS.

Point of Discharge: 33.3418N, -92.6910W

Point of Entry to the Swamp/Tributary: 33.3421N, -92.6904W (flowing)

Point of entry to Tributary of Smackover Creek: 33.3416, -92.6854W (flowing)

Section III – AREAS OF CONCERN

This discharge has previously occurred at least once in the past year. The brine appears to be pooling up in areas along the upper tributary. Both the upper tributary and the tributary of Smackover Creek were affected. The pools appear to be void of aquatic animal life.

Section IV – FOLLOW UP

An EPA SPCC inspection will be performed on the site.

Section V – LIST OF APPENDICES

Appendix 1- Photo log- 15 photos



Photo Name: Photo 1 taken south.

Date of Photo: April 9, 2015

Time of Photo: 11:20am

Photographer: K.W. Sanborn

Description: Shows the brine facility with berm.



Photo Name: Photo 2 taken east.

Date of Photo: April 9, 2015

Time of Photo: 11:20am

Photographer: K. W. Sanborn

Description: Shows the sign posted at the brine facility and the source of the discharge.



Name of Photo: Photo 3 taken southeast.

Date of Photo: April 9, 2015

Time of Photo: 11:21am

Photographer: K.W. Sanborn

Description: Shows where the containment area ran over the berm and flowed eastward into the marsh.



Name of Photo: Photo 4 taken east.

Date of Photo: April 9, 2015

Time of Photo: 11:21am

Photographer: K.W. Sanborn

Description: Shows that the brine discharge overflow carried some oil with it to the marsh and into the tributary.



Name of Photo: Photo 5 taken east

Date of Photo: April 9, 2015

Time of Photo: 11:22am

Photographer: K.W. Sanborn

Description: Dead vegetation and oil and brine staining is seen between the facility and the tributary.



Name of Photo: Photo 6 taken east

Date of Photo: April 9, 2015

Time of Photo: 11:22am

Photographer: K. W. Sanborn

Description: Shows the point of entry into the tributary which flows eastward.



Name of Photo: Photo 7 taken east.

Date of Photo: April 9, 2015

Time of Photo: 11:23am

Photographer: K.W. Sanborn

Description: Shows a small amount of oil and brine which entered the tributary.



Name of Photo: Photo 8 taken southeast

Date of Photo: April 9, 2015

Time of Photo: 11:24am

Photographer: K.W. Sanborn

Description: Shows a YSI meter reading of 21,400 ppm TSS at the point of entry into the tributary.



Name of Photo: Photo 9 taken west.

Date of Photo: April 9, 2015

Time of Photo: 11:24am

Photographer: K. W. Sanborn

Description: Shown is a view from the point of entry back to the facility. Notice the oil staining in the tributary.



Name of Photo: Photo 10 taken west.

Date of Photo: April 9, 2015

Time of Photo: 11:49am

Photographer: K. W. Sanborn

Description: Shows the same marshy tributary east of the entry point. The water is rust colored and does not contain any aquatic life. Flow is eastward into another marshy area downstream.



Name of Photo: Photo 11 taken west

Date of Photo: April 9, 2015

Time of Photo: 11:49am

Photographer: K.W. Sanborn

Description: Shows a YSI meter reading of 14,000 ppm TSS in the area shown in Photo 10.



Name of Photo: Photo 12 taken east.

Date of Photo: April 9, 2015

Time of Photo: 11:23am

Photographer: K.W. Sanborn

Description: Shows a marshy area east of Photo 10 near the junction of a small creek.



Name of Photo: Photo 13 taken south.

Date of Photo: April 9, 2015

Time of Photo: 11:23am

Photographer: K.W. Sanborn

Description: Shows a YSI meter reading of 14,000 ppm TSS of the marsh in Photo 12.



Name of Photo: Photo 14 taken south.

Date of Photo: April 9, 2015

Time of Photo: 11:49am

Photographer: K.I.W. Sanborn

Description: Shows a view of the unaffected part of the marshy tributary system that is upstream of the discharge entry point.



Name of Photo: Photo 15 taken south.

Date of Photo: April 9, 2015

Time of Photo: 11:49AM

Photographer: K.W. Sanborn

Description: Shows the YSI meter reading of 1500 ppm TSS in the unaffected portion of the marsh.