

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	04/17/2025	
Media Program:	Water (CWA)	
Regulatory Program(s)	Water (CWA) Brine Program (Oil & Gas inspection)	
Company Name:	C12: Arkansas Oil, LLC	
Facility Name:	Midway Smackover Unit Tract #17 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 33.459617, -93.582800.	
(city, state, zip code)	Lewisville, AR 71845	
Mailing address:	Hwy 25 1124	
(city, state, zip code)	Lowerville, 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:	ARU002304	
Media Identifier Number:	N/A	
NAICS:	211111	
SIC:	1311	
Personnel participating in inspection:		
Kerri McCabe (lead)	EPA / Region 6 ECDW	Inspector / Enforcement Officer
Michael Blaha	EPA / Region 6 ECDW	Inspector / Enforcement Officer
Uma Lad	EPA / Region 6 ECDW	Inspector / Enforcement Officer
EPA Lead Inspector Signature/Date	KERRI MCCABE Kerri McCabe	Digitally signed by KERRI MCCABE Date: 2025.05.29 06:18:59 -05'00' Date
Supervisor Signature/Date	JEANNE ECKHART Jeanne Eckhart	Digitally signed by JEANNE ECKHART Date: 2025.05.29 07:22:29 -05'00' Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Kerri McCabe (lead), Michael Blaha, and Uma Lad arrived at the C12: Arkansas Oil, LLC / Midway Smackover Unit Tract #17 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 33.459617, -93.582800 in Lewisville (Baker Community), Lafayette County, Arkansas; at 1110 on 04/17/2025 for an unannounced inspection. Mr. Michael Pearson 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 C12: Arkansas Oil, LLC / Midway Smackover Unit Tract #17 Tank Battery facility, which contains four (4) tank batteries with a total of ten (10) tanks that include storage, separation, and free water knock out (FWKO) for crude oil and saltwater processing and storage.



Map 1. Aerial imagery (Google Earth dated 10/30/2023) of the C12: Arkansas Oil, LLC / Midway Smackover Unit Tract #17 Tank Battery facility.

Section II - OBSERVATIONS

I observed the facility signage, secondary containment, 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 a tank battery with two (2) saltwater storage tanks and a pump, a drainpipe with no shutoff valve or cap, and an erosion gully through the berm; see Photos No. 3 through No. 5.

I observed a tank battery with three (3) separators and numerous flowlines, see Photo No. 6.

I observed the upstream and downstream drainage area for the facility, see Photos No. 7, No. 8, and No. 12.

I observed a tank battery with two (2) crude oil storage tanks, one (1) gun barrel, and one FWKO tank; a transfer line without a catchment bucket, loose crude oil on the ground outside secondary containment, and a drainpipe without a shutoff valve or cap; see Photos No. 9 through No. 11.

I observed a tank battery with one (1) crude oil storage tank and a drainpipe without a shutoff valve or cap, see Photos No. 13 and No. 14.

Section III – AREAS OF CONCERN

A closing conference was held with Mr. Micheal Pearson with C12: Arkansas Oil, LLC after the inspection. Areas of concern at the time of the inspection include the following:

- Drainpipes for tank batteries that did not have shutoff valves or caps (Photos No. 4, No. 11, and No. 14),
- An erosion gully in the berm for the saltwater storage tank battery (Photo No. 5 and No. 7),
- Loose crude oil on the ground outside the crude oil storage tank battery (Photo No. 9),
- No catchment bucket for the transfer line outside secondary containment for the crude oil storage tank battery (Photo No. 9), and
- Evidence of a historic saltwater release that has not been properly remediated (Photo No. 12).

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.

Section V – LIST OF APPENDICES

Appendix 1 – Photograph Log – 14 photos taken 04/17/2025.

Appendix 1

Photograph Log 14 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

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 33.459617, -93.582800.

City: Lewisville

County/Parish: Lafayette

State: Arkansas



Photo File Name: 100-0826

Orientation: 41° NE

Date of Photo: 04/17/2025

Time of Photo: 1115

Latitude: 33.459617

Longitude: -93.582800

Photographer: Kerri McCabe

Description: Looking NE, this photo shows the signage for the C12: Arkansas Oil, LLC – Midway Smackover Unit Tract #17 Tank Battery ("facility").



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

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 33.459617, -93.582800.

City: Lewisville

County/Parish: Lafayette

State: Arkansas



Photo File Name: 100-0827

Orientation: 69° ENE

Date of Photo: 04/17/2025

Time of Photo: 1115

Latitude: 33.459633

Longitude: -93.582950

Photographer: Kerri McCabe

Description: Looking ENE, this photo shows an overview of the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

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 33.459617, -93.582800.

City: Lewisville

County/Parish: Lafayette

State: Arkansas



Photo File Name: 100-0828

Orientation: 350° N

Date of Photo: 04/17/2025

Time of Photo: 1119

Latitude: 33.459850

Longitude: -93.582767

Photographer: Kerri McCabe

Description: Looking N, this photo shows one of four tank batteries (saltwater storage and pump) observed at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

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 33.459617, -93.582800.		
City: Lewisville	County/Parish: Lafayette	State: Arkansas



Photo File Name: 100-0829

Orientation: 347° NNW

Date of Photo: 04/17/2025

Time of Photo: 1119

Latitude: 33.459850

Longitude: -93.582783

Photographer: Kerri McCabe

Description: Looking NNW, this photo shows the drainpipe for the tank battery in Photo No. 3 without a shutoff valve or cap.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

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 33.459617, -93.582800.

City: Lewisville

County/Parish: Lafayette

State: Arkansas



Photo File Name: 100-0830

Orientation: 336° NNW

Date of Photo: 04/17/2025

Time of Photo: 1119

Latitude: 33.459867

Longitude: -93.582683

Photographer: Kerri McCabe

Description: Looking NNW, this photo shows an erosion gully in the berm of the tank battery from Photo No. 3.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

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 33.459617, -93.582800.

City: Lewisville

County/Parish: Lafayette

State: Arkansas



Photo File Name: 100-0831

Orientation: 133° SE

Date of Photo: 04/17/2025

Time of Photo: 1120

Latitude: 33.459950

Longitude: -93.582350

Photographer: Kerri McCabe

Description: Looking SE, this photo shows two of four tank batteries (separators) observed at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

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 33.459617, -93.582800.

City: Lewisville

County/Parish: Lafayette

State: Arkansas



Photo File Name: 100-0832

Orientation: 0° N

Date of Photo: 04/17/2025

Time of Photo: 1121

Latitude: 33.459700

Longitude: -93.582500

Photographer: Kerri McCabe

Description: Looking N, this photo shows the upstream drainage area from the tank battery in Photo No. 3.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

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 33.459617, -93.582800.		
City: Lewisville	County/Parish: Lafayette	State: Arkansas



Photo File Name: 100-0833

Orientation: 81° E

Date of Photo: 04/17/2025

Time of Photo: 1121

Latitude: 33.459700

Longitude: -93.582500

Photographer: Kerri McCabe

Description: Looking E, this photo shows the downstream drainage area from the tank battery in Photo No. 3.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

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 33.459617, -93.582800.

City: Lewisville

County/Parish: Lafayette

State: Arkansas



Photo File Name: 100-0837

Orientation: 31° NNE

Date of Photo: 04/17/2025

Time of Photo: 1123

Latitude: 33.459483

Longitude: -93.582717

Photographer: Kerri McCabe

Description: Looking NNE, this photo shows three of four tank batteries (crude oil storage) observed at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

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 33.459617, -93.582800.

City: Lewisville

County/Parish: Lafayette

State: Arkansas



Photo File Name: 100-0834

Orientation: 326° NNW

Date of Photo: 04/17/2025

Time of Photo: 1122

Latitude: 33.459617

Longitude: -93.582500

Photographer: Kerri McCabe

Description: Looking NNW, this photo shows the backside of the tank battery from Photo No. 9.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

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 33.459617, -93.582800.

City: Lewisville

County/Parish: Lafayette

State: Arkansas



Photo File Name: 100-0835

Orientation: 191° S

Date of Photo: 04/17/2025

Time of Photo: 1122

Latitude: 33.459633

Longitude: -93.582500

Photographer: Kerri McCabe

Description: Looking S, this photo shows the drainpipe for the tank battery in Photo No. 9 without a shutoff valve or cap.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

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 33.459617, -93.582800.		
City: Lewisville	County/Parish: Lafayette	State: Arkansas



Photo File Name: 100-0836

Orientation: 100° E

Date of Photo: 04/17/2025

Time of Photo: 1122

Latitude: 33.459583

Longitude: -93.582367

Photographer: Kerri McCabe

Description: Looking E, this photo shows an area downstream of the facility that appeared to be impacted by a historic saltwater kill.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

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 33.459617, -93.582800.		
City: Lewisville	County/Parish: Lafayette	State: Arkansas



Photo File Name: 100-0838

Orientation: 112° ESE

Date of Photo: 04/17/2025

Time of Photo: 1124

Latitude: 33.459483

Longitude: -93.582700

Photographer: Kerri McCabe

Description: Looking ESE, this photo shows four of four tank batteries observed at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

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 33.459617, -93.582800.

City: Lewisville

County/Parish: Lafayette

State: Arkansas



Photo File Name: 100-0839

Orientation: 8° N

Date of Photo: 04/17/2025

Time of Photo: 1124

Latitude: 33.459350

Longitude: -93.582583

Photographer: Kerri McCabe

Description: Looking N, this photo shows the drainpipe for the tank battery in Photo No. 13 without a shutoff valve or cap.