

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	10/08/2024	
Media Program:	Water (CWA)	
Regulatory Program(s)	Water (CWA) Brine Program (Oil & Gas inspection)	
Company Name:	Eubanks, James and Mike (J&M)	
Facility Name:	Patterson 2 and 3 SWD Tank Battery	
Facility Physical Location:	From Highway 7B in Sandy Land, then left onto Union Co Rd 459, off an oil lease road at 33.341667, -92.712500	
(city, state, zip code)	Smackover, AR, 71762	
Mailing address:	615 Broadway	
(city, state, zip code)	Smackover, AR, 71762	
County/Parish:	Union County	
Facility Phone Number	870-725-2907	
Facility Contact:	James Eubanks rick@jrmorgancpa.com	Person Responsible for Operation
FRS Number:	N/A	
Identification/Permit Number:	ARU002253	
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	Date
Supervisor Signature/Date		
	Jeanne Eckhart	Date

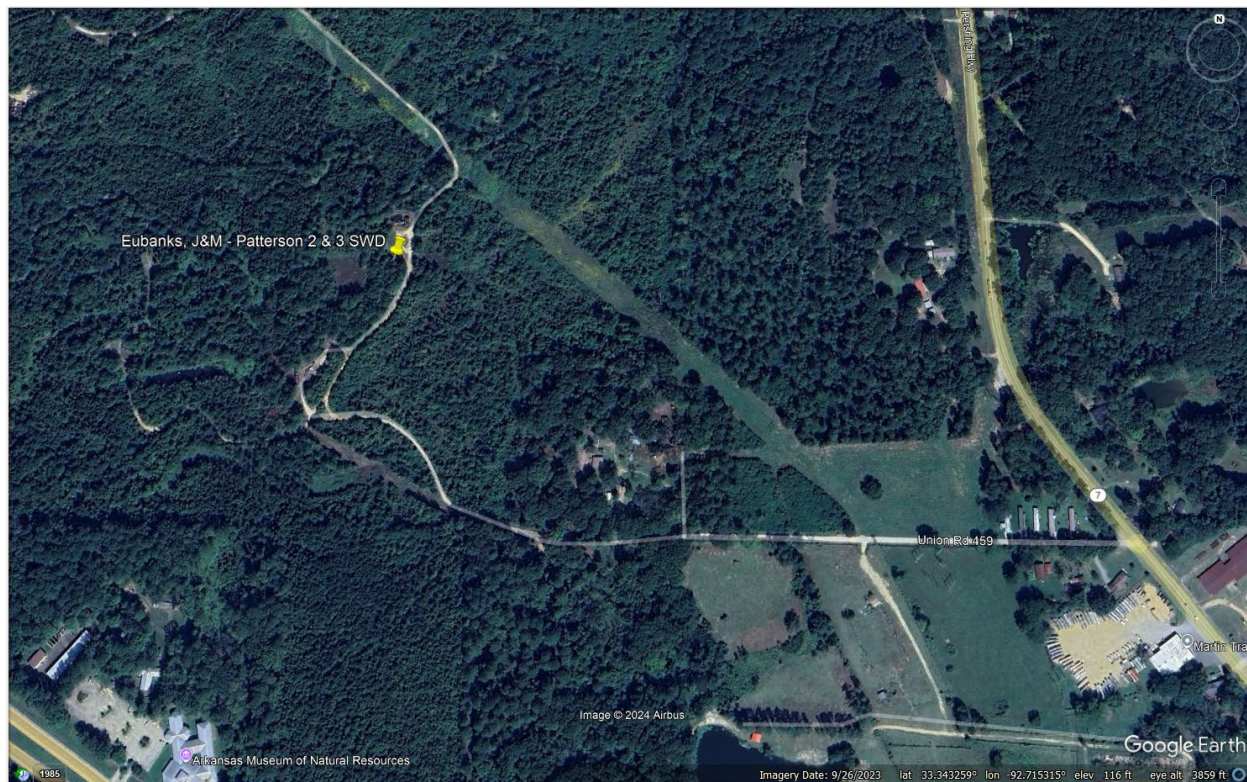
Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Kerri McCabe (lead), Michael Blaha, and Uma Lad arrived at the Eubanks, James and Mike (J&M) / Patterson 2 and 3 SWD Tank Battery, located from Highway 7B in Sandy Land, then left onto Union Co Rd 459, off an oil lease road at 33.341667, -92.712500; at 1130 on 10/08/2024 for an unannounced inspection. No facility representatives were present 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 Eubanks, James and Mike (J&M) / Patterson 2 and 3 SWD Tank Battery, which contained one (1) tank battery, six (6) storage/separator tanks for crude oil and saltwater, and two (2) Saltwater Disposal (SWD) wells.



Map 1. Aerial imagery (Google Earth dated 09/26/2023) of the James and Mike (J&M) Eubanks – Patterson 2 and 3 SWD Tank Battery.

Section II – OBSERVATIONS

I observed the Eubanks, James and Mike (J&M) / Patterson 2 and 3 SWD Tank Battery and associated secondary containment, storage tanks, and saltwater disposal (SWD) wells; see Appendix 1 (Photographs Log), see Photo No. 1. For additional GPS location and photo metadata, see Appendix 1.

I observed production/transfer lines outside secondary containment without catchment buckets, see Photo No. 2 and No. 3.

I observed loose oil around tanks and active leaks of crude oil from tanks/valves inside secondary containment, see Photo No. 4, No. 11, No. 12, and No. 19.

I observed the drainpipe, cap, and flowpath from the secondary containment; see Photo No. 5 through No. 9.

I observed active leaks of saltwater, saltwater staining, salt crystals, and saltwater corrosion of a storage tank inside secondary containment; see Photo No. 10, and No. 13 through No. 18.

I observed one of two SWD wells located in the area, see Photo No. 20.

Section III – AREAS OF CONCERN

No closing conference was held due to no personnel with James and Mike (J&M) Eubanks being present during the inspection. Areas of concern at the time of the inspection include the following:

- No signage at the tank battery,
- Transfer pipes and residual oil staining outside secondary containment without catchment buckets,
- Loose oil and active leaks of crude oil inside the secondary containment for the facility,
- Minor leak of crude oil from the cap on the drainpipe for secondary containment, and
- Active leaks of saltwater, saltwater staining, salt crystals, and saltwater corrosion inside secondary containment.

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 – 20 photos taken 10/08/2024.

Appendix 1

Photograph Log 20 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: J & M Eubanks – Patterson 2 and 3 SWD Tank Battery in Sandy Land at 33.341667, -92.712500.		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: P909-0065

Orientation: N

Date of Photo: 10/08/2024

Time of Photo: 1145

Latitude: 33.341992

Longitude: -92.712389

Photographer: Kerri McCabe

Description: Looking N, this photo shows an overview of the Patterson 2 and 3 SWD Tank Battery; no signage onsite.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: J & M Eubanks – Patterson 2 and 3 SWD Tank Battery in Sandy Land at 33.341667, -92.712500.		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: P909-0066

Orientation: NW

Date of Photo: 10/08/2024

Time of Photo: 1145

Latitude: 33.342021

Longitude: -92.712368

Photographer: Kerri McCabe

Description: Looking NW, this photo shows a production/transfer pipe without a catch bucket.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: J & M Eubanks – Patterson 2 and 3 SWD Tank Battery in Sandy Land at 33.341667, -92.712500.		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: P909-0067

Orientation: NW

Date of Photo: 10/08/2024

Time of Photo: 1146

Latitude: 33.342107

Longitude: -92.712322

Photographer: Kerri McCabe

Description: Looking NW, this photo shows a second production/transfer pipe without a catch bucket and loose oil outside of secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: J & M Eubanks – Patterson 2 and 3 SWD Tank Battery in Sandy Land at 33.341667, -92.712500.		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: P909-0068

Orientation: NW

Date of Photo: 10/08/2024

Time of Photo: 1146

Latitude: 33.342073

Longitude: -92.712376

Photographer: Kerri McCabe

Description: Looking NW, this photo shows loose oil inside the secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: J & M Eubanks – Patterson 2 and 3 SWD Tank Battery in Sandy Land at 33.341667, -92.712500.		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: P909-0069

Orientation: NW

Date of Photo: 10/08/2024

Time of Photo: 1146

Latitude: 33.342141

Longitude: -92.712383

Photographer: Kerri McCabe

Description: Looking NW, this photo shows produced water inside the secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: J & M Eubanks – Patterson 2 and 3 SWD Tank Battery in Sandy Land at 33.341667, -92.712500.		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: P909-0070

Orientation: NW

Date of Photo: 10/08/2024

Time of Photo: 1146

Latitude: 33.342141

Longitude: -92.712383

Photographer: Kerri McCabe

Description: Looking NW, this photo shows produced water collected at the drainpipe for secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: J & M Eubanks – Patterson 2 and 3 SWD Tank Battery in Sandy Land at 33.341667, -92.712500.		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: P909-0071

Orientation: W

Date of Photo: 10/08/2024

Time of Photo: 1146

Latitude: 33.342193

Longitude: -92.712421

Photographer: Kerri McCabe

Description: Looking W, this photo shows the cap on the drainpipe for secondary containment; minor leak of crude oil was noted at the drainpipe.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: J & M Eubanks – Patterson 2 and 3 SWD Tank Battery in Sandy Land at 33.341667, -92.712500.		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: P909-0072

Orientation: SE

Date of Photo: 10/08/2024

Time of Photo: 1147

Latitude: 33.342193

Longitude: -92.712421

Photographer: Kerri McCabe

Description: Looking SE, this photo shows the flowpath from the drainpipe for secondary containment leading to Holmes Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: J & M Eubanks – Patterson 2 and 3 SWD Tank Battery in Sandy Land at 33.341667, -92.712500.		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: P909-0073

Orientation: SW

Date of Photo: 10/08/2024

Time of Photo: 1147

Latitude: 33.342094

Longitude: -92.712555

Photographer: Kerri McCabe

Description: Looking SW, this photo shows additional view of the produced water inside secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: J & M Eubanks – Patterson 2 and 3 SWD Tank Battery in Sandy Land at 33.341667, -92.712500.		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: P909-0074

Orientation: W-SW

Date of Photo: 10/08/2024

Time of Photo: 1147

Latitude: 33.342094

Longitude: -92.712555

Photographer: Kerri McCabe

Description: Looking W-SW, this photo shows saltwater and salt crystals inside secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: J & M Eubanks – Patterson 2 and 3 SWD Tank Battery in Sandy Land at 33.341667, -92.712500.		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: P909-0075

Orientation: NW

Date of Photo: 10/08/2024

Time of Photo: 1148

Latitude: 33.342094

Longitude: -92.712555

Photographer: Kerri McCabe

Description: Looking NW, this photo shows a crude oil leak and loose oil inside secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: J & M Eubanks – Patterson 2 and 3 SWD Tank Battery in Sandy Land at 33.341667, -92.712500.		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: P909-0076

Orientation: NW

Date of Photo: 10/08/2024

Time of Photo: 1148

Latitude: 33.342094

Longitude: -92.712555

Photographer: Kerri McCabe

Description: Looking NW, this photo shows the flowpath of crude oil from a storage tank inside secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: J & M Eubanks – Patterson 2 and 3 SWD Tank Battery in Sandy Land at 33.341667, -92.712500.		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: P909-0077

Orientation: NE

Date of Photo: 10/08/2024

Time of Photo: 1148

Latitude: 33.342094

Longitude: -92.712555

Photographer: Kerri McCabe

Description: Looking NE, this photo shows an additional view of saltwater and salt crystals inside secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: J & M Eubanks – Patterson 2 and 3 SWD Tank Battery in Sandy Land at 33.341667, -92.712500.		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: P909-0078

Orientation: NW

Date of Photo: 10/08/2024

Time of Photo: 1148

Latitude: 33.342063

Longitude: -92.712468

Photographer: Kerri McCabe

Description: Looking NW, this photo shows an overview of the storage tanks inside secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: J & M Eubanks – Patterson 2 and 3 SWD Tank Battery in Sandy Land at 33.341667, -92.712500.		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: P909-0079

Orientation: NW

Date of Photo: 10/08/2024

Time of Photo: 1149

Latitude: 33.342063

Longitude: -92.712468

Photographer: Kerri McCabe

Description: Looking NW, this photo shows a corroded tank with loose oil and salt crystals.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: J & M Eubanks – Patterson 2 and 3 SWD Tank Battery in Sandy Land at 33.341667, -92.712500.		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: P909-0080

Orientation: NW

Date of Photo: 10/08/2024

Time of Photo: 1149

Latitude: 33.342063

Longitude: -92.712468

Photographer: Kerri McCabe

Description: Looking NW, this photo shows an additional view of the loose oil and salt crystals from Photo No. 15.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: J & M Eubanks – Patterson 2 and 3 SWD Tank Battery in Sandy Land at 33.341667, -92.712500.		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: P909-0081

Orientation: W-NW

Date of Photo: 10/08/2024

Time of Photo: 1149

Latitude: 33.342063

Longitude: -92.712468

Photographer: Kerri McCabe

Description: Looking W-NW, this photo shows a closeup of the corroded tank inside secondary containment from Photo No. 15 and 16.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: J & M Eubanks – Patterson 2 and 3 SWD Tank Battery in Sandy Land at 33.341667, -92.712500.		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: P909-0082

Orientation: NE

Date of Photo: 10/08/2024

Time of Photo: 1149

Latitude: 33.342063

Longitude: -92.712468

Photographer: Kerri McCabe

Description: Looking NE, this photo shows an active leak in the corroded storage tank from Photo No. 15 through 17.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: J & M Eubanks – Patterson 2 and 3 SWD Tank Battery in Sandy Land at 33.341667, -92.712500.		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: P909-0083

Orientation: W-NW

Date of Photo: 10/08/2024

Time of Photo: 1150

Latitude: 33.342063

Longitude: -92.712468

Photographer: Kerri McCabe

Description: Looking W-NW, this photo shows an overview from the backside of the secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

Location: J & M Eubanks – Patterson 2 and 3 SWD Tank Battery in Sandy Land at 33.341667, -92.712500.		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: P909-0084

Orientation: N-NE

Date of Photo: 10/08/2024

Time of Photo: 1151

Latitude: 33.341667

Longitude: -92.712500

Photographer: Kerri McCabe

Description: Looking N-NE, this photo shows one of two Saltwater Disposal (SWD) wells located in the area.