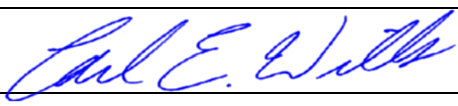


Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	06/07/2022	
Media Program:	Water	
Regulatory Program(s)	Clean Water Act – National Pollution Discharge Elimination System (Brine)	
Company Name:	PE-Osage, LLC	
Facility Name:	Flat Rock Unit	
Facility Physical Location:	Latitude: 36.230669, Longitude: -96.026946	
(city, state, zip code)	Tulsa, Oklahoma, 74120	
Mailing address:	PO BOX 13178	
(city, state, zip code)	Oklahoma City, Oklahoma, 73113	
County/Parish:	Osage County	
Facility Phone Number	405-607-8826	
Facility Contact:	Roy Fletcher	CEO
	raf@pennant-energy.com	
FRS Number:	n/a	
Identification/Permit Number:	OKU000840	
Media Identifier Number:	n/a	
NAICS:	211111	
SIC:	1311	
Personnel participating in inspection:		
Matthew Allen	EPA, Region 6 ECDW	Inspector
Carl Wills	EPA, Region 6 ECDWA	Inspector
EPA Lead Inspector Signature/Date		07/28/2022
	Carl Wills	Date
Supervisor Signature/Date		
	Esteban Herrera	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Carl Wills and Matthew Allen arrived at the PE-Osage, LLC, Flat Rock Unit (EPA ID No. OKU000840), at 10:25 AM on 06/07/2022 for an unannounced follow-up inspection. Carl Wills was the lead inspector for the inspection. There was no company representative present at the inspection. The inspection was conducted by the authority of the Clean Water Act to determine compliance with Environmental Protection Agency (EPA) regulations. There was no other Federal, State or Local agency present at the time of the inspection.

FACILITY DESCRIPTION

EPA conducted an inspection on the PE-Osage, LLC, Flat Rock Unit where produced water (brine) impacted the land and an unnamed tributary. The Flatrock Lease was located northwest of Tulsa, Oklahoma, in Osage County.

Section II - OBSERVATIONS

I observed a Total Dissolved Solids (TDS) field reading of 631 mg/L in the main channel of the impacted tributary (see Appendix 1/photo log, photo No. 1), immediately adjacent to the area of brine impacted soil and grass. The TDS field reading was taken with a properly calibrated YSI Pro 30 conductivity meter. I observed the bed and bank features of the impacted tributary, these observations are documented in photo No. 2. I observed the flow path of the spill overland, approximately 70 percent of the land impacts had fully recovered with vegetation. Evidence of the re-vegetation was documented in photos No. 3 and 4. All observation were made from the approximate GPS location of 36.230861, -96.027011.

Section III – AREAS OF CONCERN

EPA Region 6 inspectors observed an area of brine impacted soil measuring approximately 15 feet in width by 30 feet in length. The impacted area should be monitored for continued improvement, if no improvement is documented, PE-Osage, LLC should clean the affected area to remove brine from the flowpath.

Section IV – FOLLOW UP

No additional information was received by EPA after exiting the Facility on 06/07/2022.

Section V – LIST OF APPENDICES

Appendix 1 - Photo log - 4 Photos taken 06/07/2022.

Appendix 1

Photograph Log 4 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: 36.230669, -96.026946		
City: Tulsa	County/Parish: Osage	State: Oklahoma



Photo File Name: RIMG0013

Orientation: n/a

Date of Photo: 06/07/2022

Time of Photo: 10:57 AM

Latitude: 36.230861 estimated

Longitude: 96.027011 estimated

Photographer: Carl Wills

Description: This was a TDS field reading of 631 mg/L taken in the main channel of the impacted tributary immediately adjacent to an area of impacted soil and vegetation.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: 36.230669, -96.026946		
City: Tulsa	County/Parish: Osage	State: Oklahoma



Photo File Name: RIMG0014

Orientation: NE

Date of Photo: 06/07/2022

Time of Photo:

Latitude: 36.230861 estimated

Longitude: -96.027011 estimated

Photographer: Carl Wills

Description: This was a photo of the impacted tributary, with a view to the northeast, showing the bed and bank features of the tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: 36.230669, -96.026946		
City: Tulsa	County/Parish: Osage	State: Oklahoma



Photo File Name: RIMG0017

Orientation: SE

Date of Photo: 06/07/2022

Time of Photo: 11:12 AM

Latitude: 36.230861 estimated

Longitude: -96.027011 estimated

Photographer: Carl Wills

Description: This was a photo showing the grass had begun to re-establish across portions of the flowpath.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: 36.230669, -96.026946		
City: Tulsa	County/Parish: Osage	State: Oklahoma



Photo File Name: RIMG0018

Orientation: SE

Date of Photo: 06/07/2022

Time of Photo: 11:12 AM

Latitude: 36.230861 estimated

Longitude: -96.027011 estimated

Photographer: Carl Wills

Description: This was a photo showing the portion of the flowpath/impacted soil and grass that had not been able to re-establish vegetation due to brine impacts. Approximately 70 percent of the land impacted area had been fully recovered with vegetation.