

## Region 6 - Enforcement & Compliance Assurance Division

### INSPECTION REPORT

|                                        |                                                                                                                                                                                                                 |                                  |
|----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|
| Inspection Date(s):                    | 12/03/2025                                                                                                                                                                                                      |                                  |
| Media Program:                         | Water (CWA)                                                                                                                                                                                                     |                                  |
| Regulatory Program(s)                  | Water (CWA) Brine Program (Oil & Gas inspection)                                                                                                                                                                |                                  |
| Company Name:                          | <b>Berg, Laney and Brown Company</b>                                                                                                                                                                            |                                  |
| Facility Name:                         | <b>Baugh Tank Battery</b>                                                                                                                                                                                       |                                  |
| Facility Physical Location:            | From Norphlet (Joyce Community), State Highway 7, right at State Highway 335, left on W Padgett, right on N Texas, straight on Hayes City Rd (Ouachita CR 68), right on oilfield road at 33.370061, -92.647318. |                                  |
| (city, state, zip code)                | Louann, AR 71751                                                                                                                                                                                                |                                  |
| Mailing address:                       | 108 E Washington Street Rear                                                                                                                                                                                    |                                  |
| (city, state, zip code)                | Camden, AR 71701                                                                                                                                                                                                |                                  |
| County/Parish:                         | Ouachita County                                                                                                                                                                                                 |                                  |
| Facility Phone Number                  | 870-836-4121                                                                                                                                                                                                    |                                  |
| Facility Contact:                      | H. M. Berg, Jr.<br><a href="mailto:jamie@blbco.us">jamie@blbco.us</a>                                                                                                                                           | Person Responsible for Operation |
| FRS Number:                            | N/A                                                                                                                                                                                                             |                                  |
| Identification/Permit Number:          | ARU002341                                                                                                                                                                                                       |                                  |
| Media Identifier Number:               | N/A                                                                                                                                                                                                             |                                  |
| NAICS:                                 | 211111                                                                                                                                                                                                          |                                  |
| SIC:                                   | 1311                                                                                                                                                                                                            |                                  |
| Personnel participating in inspection: |                                                                                                                                                                                                                 |                                  |
| Kerri McCabe (lead)                    | EPA / Region 6 ECDW                                                                                                                                                                                             | Inspector / Enforcement Officer  |
| Uma Lad                                | EPA / Region 6 ECDW                                                                                                                                                                                             | Inspector / Enforcement Officer  |
|                                        |                                                                                                                                                                                                                 |                                  |
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|                                        |                                                                                                                                                                                                                 |                                  |
| EPA Lead Inspector<br>Signature/Date   |                                                                                                                                                                                                                 |                                  |
|                                        | Kerri McCabe                                                                                                                                                                                                    | Date                             |
| Supervisor<br>Signature/Date           |                                                                                                                                                                                                                 |                                  |
|                                        | Jeanne Eckhart                                                                                                                                                                                                  | Date                             |

## Section I – INTRODUCTION

### PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Kerri McCabe (lead) and Uma Lad arrived at the Berg, Laney and Brown Company / Baugh Tank Battery (“facility”) located from State Highway 7, straight on Hayes City Road (Ouachita CR 68), right on an oilfield lease road at 33.370061, -92.647318 in Louann (Joyce Community), Ouachita County, Arkansas; at 1330 on 12/03/2025 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 Berg, Laney and Brown Company / Baugh Tank Battery facility, which contains three (3) tanks for crude oil and saltwater separation and storage and one (1) saltwater disposal (SWD) well pump shared by the Snyder Tank Battery. One tank was outside containment and appeared to be out of service.



**Map 1.** Aerial imagery (Google Earth dated 02/01/2025) of the Berg, Laney and Brown Company / Baugh Tank Battery facility.

## **Section II – OBSERVATIONS**

I observed the facility signage and an overview of the facility; see Appendix 1 (Photographs Log), Photos No. 1 and No. 2. For additional GPS location and photo metadata, see Appendix 1.

I observed the transfer/production line outside secondary containment without a catchment bucket, see Photo No. 3.

I observed one (1) tank outside secondary containment that appeared to be out of service that was not properly marked, see Photo No. 4.

## **Section III – AREAS OF CONCERN**

No closing conference was held due to no personnel with Berg, Laney and Brown Company present during the inspection. Areas of concern at the time of the inspection include the following:

- The transfer/production line without a catchment bucket (Photo No. 3), and
- One (1) tank outside secondary containment not properly marked as “out of service” (Photo No. 4).

## **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 – 4 photos taken 12/03/2025.

## Appendix 1

### Photograph Log

4 Photos



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## Photograph Log

Photo No. 1

|                    |              |                                                  |                 |               |    |            |          |  |
|--------------------|--------------|--------------------------------------------------|-----------------|---------------|----|------------|----------|--|
| Facility/Location: |              | Berg, Laney & Brown Company - Baugh Tank Battery |                 |               |    |            |          |  |
| City:              | Louann       | County:                                          | Ouachita County | State:        | AR | Direction: | SE       |  |
| Filename:          | R0011080.JPG | Photo Date:                                      |                 | 12/03/2025    |    | Time:      | 13:45:28 |  |
| Photographer:      | Kerri McCabe |                                                  |                 | Witness Name: |    | Uma Lad    |          |  |



|              |                                                                                    |            |                |
|--------------|------------------------------------------------------------------------------------|------------|----------------|
| Description: | Looking SSE, this photo shows a tank labeled with the lease name for the facility. |            |                |
| Latitude:    | 33°22'12.054" N                                                                    | Longitude: | 92°38'50.13" W |



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## Photograph Log

Photo No. 2

|                    |              |                                                  |                 |               |    |            |          |  |
|--------------------|--------------|--------------------------------------------------|-----------------|---------------|----|------------|----------|--|
| Facility/Location: |              | Berg, Laney & Brown Company - Baugh Tank Battery |                 |               |    |            |          |  |
| City:              | Louann       | County:                                          | Ouachita County | State:        | AR | Direction: | SW       |  |
| Filename:          | R0011081.JPG | Photo Date:                                      |                 | 12/03/2025    |    | Time:      | 13:45:42 |  |
| Photographer:      | Kerri McCabe |                                                  |                 | Witness Name: |    | Uma Lad    |          |  |



|              |                                                                     |            |                |
|--------------|---------------------------------------------------------------------|------------|----------------|
| Description: | Looking SW, this photo shows an overview of the Baugh Tank Battery. |            |                |
| Latitude:    | 33°22'11.826" N                                                     | Longitude: | 92°38'49.95" W |



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## Photograph Log

Photo No. 3

|                    |              |                                                  |                 |               |    |            |          |  |
|--------------------|--------------|--------------------------------------------------|-----------------|---------------|----|------------|----------|--|
| Facility/Location: |              | Berg, Laney & Brown Company - Baugh Tank Battery |                 |               |    |            |          |  |
| City:              | Louann       | County:                                          | Ouachita County | State:        | AR | Direction: | NW       |  |
| Filename:          | R0011082.JPG | Photo Date:                                      |                 | 12/03/2025    |    | Time:      | 13:45:52 |  |
| Photographer:      | Kerri McCabe |                                                  |                 | Witness Name: |    | Uma Lad    |          |  |



|              |                                                                                                                    |            |                 |
|--------------|--------------------------------------------------------------------------------------------------------------------|------------|-----------------|
| Description: | Looking NNW, this photo shows the transfer/product line for the crude oil storage tank without a catchment bucket. |            |                 |
| Latitude:    | 33°22'11.982" N                                                                                                    | Longitude: | 92°38'50.124" W |



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## Photograph Log

Photo No. 4

|                    |              |                                                  |                 |               |    |            |          |  |
|--------------------|--------------|--------------------------------------------------|-----------------|---------------|----|------------|----------|--|
| Facility/Location: |              | Berg, Laney & Brown Company - Baugh Tank Battery |                 |               |    |            |          |  |
| City:              | Louann       | County:                                          | Ouachita County | State:        | AR | Direction: | NW       |  |
| Filename:          | R0011083.JPG | Photo Date:                                      |                 | 12/03/2025    |    | Time:      | 13:46:27 |  |
| Photographer:      | Kerri McCabe |                                                  |                 | Witness Name: |    | Uma Lad    |          |  |



|              |                                                                                                                                                  |            |                 |
|--------------|--------------------------------------------------------------------------------------------------------------------------------------------------|------------|-----------------|
| Description: | Looking WNW, this photo shows a tank outside containment that was not in use. The tank was not marked, as required, indicating "out of service." |            |                 |
| Latitude:    | 33°22'12.228" N                                                                                                                                  | Longitude: | 92°38'49.938" W |