

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	07/16/2024	
Media Program:	Water (CWA)	
Regulatory Program(s)	Water (CWA) Brine Program (Oil & Gas inspection)	
Company Name:	B Pharr Operating, LLC	
Facility Name:	Stylite Townsend Tank Battery	
Facility Physical Location:	From Highway 63 E, then Armer Rd, at the intersection of Lockner Rd at 33.256110, -92.534660	
(city, state, zip code)	Old Union, AR, 71730	
Mailing address:	P.O. Box 130	
(city, state, zip code)	Emerson, AR, 71740	
County/Parish:	Union County	
Facility Phone Number	870-904-5573	
Facility Contact:	Billy Pharr	Owner / Operator
	bp@hydrooil.net	
FRS Number:	N/A	
Identification/Permit Number:	ARU002211	
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
EPA Lead Inspector Signature/Date		
	Kerri McCabe	Date
Supervisor Signature/Date		
	Jeanne Eckhart	Date

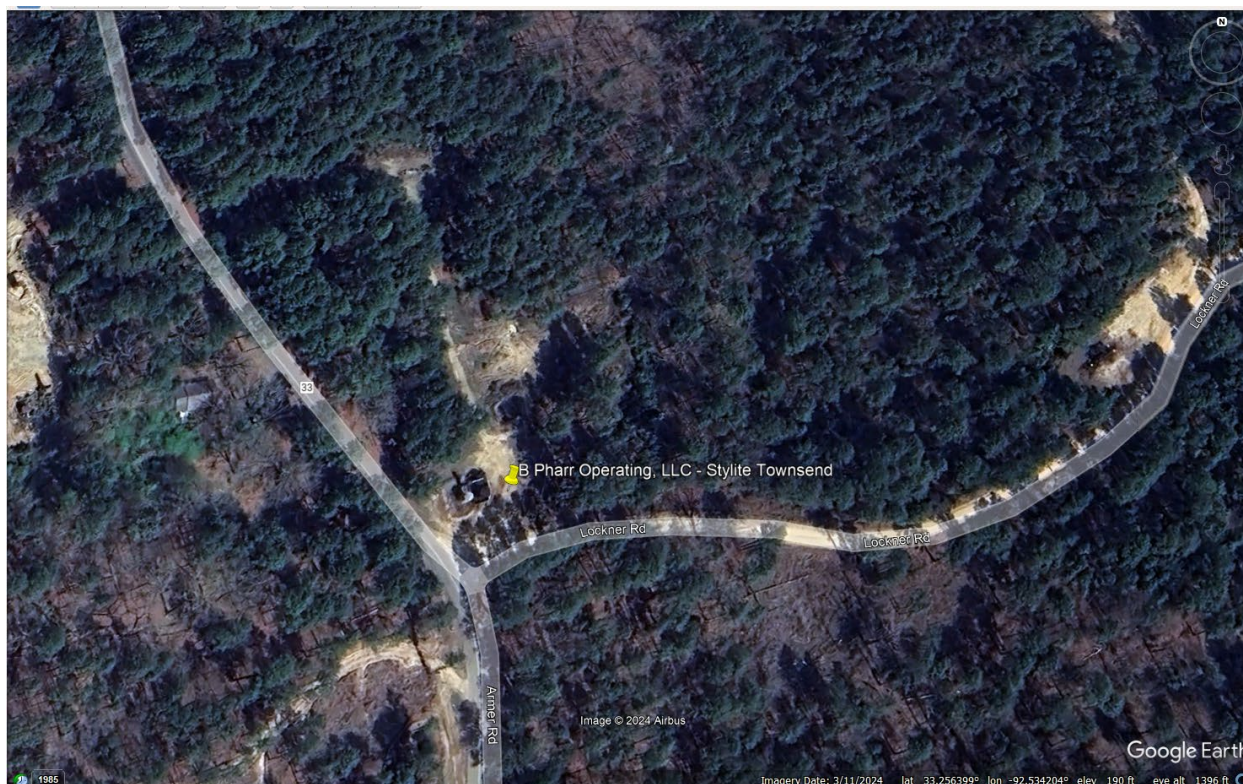
Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Kerri McCabe (lead) and Michael Blaha arrived at the B Pharr Operating, LLC / Stylite Townsend Tank Battery, located from Highway 63 E, then Armer Rd, at the intersection of Lockner Rd at 33.256110, -92.534660; at 1000 on 07/16/2024 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. This facility was last inspected on 12/14/2023 by Inspector Michael Blaha.

FACILITY DESCRIPTION

EPA conducted a follow-up inspection on the B Pharr Operating, LLC / Stylite Townsend facility, which contained two (2) tank batteries, three (3) storage tanks for crude oil and saltwater, two (2) oil-water separators, and one (1) Saltwater Disposal (SWD) well.



Map 1. Aerial imagery (Google Earth dated 03/11/2024) of the B Pharr Operating, LLC – Stylite Townsend Tank Battery.

Section II - OBSERVATIONS

I observed the B Pharr Operating, LLC – Stylite Townsend Tank Battery, signage, and associated secondary containment, storage tanks, separators/treaters, and saltwater disposal (SWD) well; see Appendix 1 (Photographs Log), Photo No. 1 and No. 2. For additional GPS location and photo metadata, see Appendix 1.

I observed loose oil around the drainpipe for the secondary containment for the main tank battery and a transfer pipe without a catchment bucket, see Photo No. 1 and No. 3.

I observed loose oil floating on top of stormwater commingled with saltwater inside the secondary containment for the main tank battery, see Photo No. 4 through No. 6.

I observed an active leak from a valve for piping inside the secondary containment for the main tank battery, see Photo No. 6.

I observed oil seeping from the secondary containment structure for the main tank battery, see Photo No. 7 and No. 8.

I observed an additional secondary containment structure and a drainpipe for an oil-water separator adjacent to the main tank battery, see Photo No. 9, No. 10, and No. 12.

I observed loose oil inside the secondary containment for the oil-water separator, see Photo No. 10.

I observed the stormwater and discharge flowpath for the secondary containments for the main tank battery and the oil-water separator tank battery, see Photo No. 11, No. 13, and No. 14.

I observed erodible soils denuded of vegetation and a grouping of dead trees from a previous saltwater discharge that was downstream of the tank batteries and SWD well, see Photo No. 14, No. 15, No. 17, and No. 19.

I observed a dry ephemeral stream that receives stormwater and discharges from the B Pharr Operating, LLC – Stylite Townsend Tank Battery and Stylite Townsend #1 SWD, see Photo No. 16. This is the point of entry (POE) for stormwater and discharges.

I observed the Stylite Townsend #1 SWD well and associated flowlines, see Photo No. 18 and No. 19.

Section III – AREAS OF CONCERN

No closing conference was held due to no personnel with B Pharr Operating, LLC being present during the inspection. Areas of concern at the time of the inspection include the following:

- Loose, residual oil on the ground outside the secondary containment drainpipe for the main tank battery,
- A transfer pipe outside secondary containment without a catchment bucket,

- Loose oil on top of stormwater commingled with saltwater inside the secondary containment for the main tank battery,
- An active leak from a valve on the transfer pipe inside the secondary containment for the main tank battery,
- Oil actively seeping from the secondary containment structure for the main tank battery indicating inadequate permeable secondary containment,
- Loose oil inside the secondary containment for the individual oil-water separator,
- The drainpipe for the oil-water separator tank battery without a cap or shutoff valve, and
- Erodible soils denuded of vegetation and dead trees from previous saltwater discharge(s).

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. Similar areas of concern were noted in the 12/14/2023 inspection conducted by Inspector Michael Blaha.

Section V – LIST OF APPENDICES

Appendix 1 – Photograph Log – 19 photos taken 07/16/2024.

Appendix 1

Photograph Log 19 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: B Pharr Operating, LLC – Stylite Townsend Tank Battery from Highway 63 E, then Armer Rd, at the intersection of Lockner Rd at 33.256110, -92.534660.

City: Old Union

County/Parish: Union County

State: Arkansas



Photo File Name: 100-0252

Orientation: W

Date of Photo: 07/16/2024

Time of Photo: 1002

Latitude: 33.256033

Longitude: -92.534700

Photographer: Kerri McCabe

Description: Looking W, this photo shows an overview of the Stylite Townsend Tank Battery.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: B Pharr Operating, LLC – Stylite Townsend Tank Battery from Highway 63 E, then Armer Rd, at the intersection of Lockner Rd at 33.256110, -92.534660.

City: Old Union

County/Parish: Union County

State: Arkansas



Photo File Name: 100-0253

Orientation: W

Date of Photo: 07/16/2024

Time of Photo: 1002

Latitude: 33.256078

Longitude: -92.534685

Photographer: Kerri McCabe

Description: Looking W, this photo shows the signage at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: B Pharr Operating, LLC – Stylite Townsend Tank Battery from Highway 63 E, then Armer Rd, at the intersection of Lockner Rd at 33.256110, -92.534660.		
City: Old Union	County/Parish: Union County	State: Arkansas



Photo File Name: 100-0254

Orientation: NNW

Date of Photo: 07/16/2024

Time of Photo: 1002

Latitude: 33.256089

Longitude: -92.534689

Photographer: Kerri McCabe

Description: Looking NNW, this photo shows loose oil around the drainpipe for the secondary containment for the main tank battery and a transfer pipe without a catchment bucket.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: B Pharr Operating, LLC – Stylite Townsend Tank Battery from Highway 63 E, then Armer Rd, at the intersection of Lockner Rd at 33.256110, -92.534660.		
City: Old Union	County/Parish: Union County	State: Arkansas



Photo File Name: 100-0255

Orientation: NNW

Date of Photo: 07/16/2024

Time of Photo: 1002

Latitude: 33.256093

Longitude: -92.534707

Photographer: Kerri McCabe

Description: Looking NNW, this photo shows loose oil, saltwater, and stormwater inside the secondary containment for the main tank battery.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: B Pharr Operating, LLC – Stylite Townsend Tank Battery from Highway 63 E, then Armer Rd, at the intersection of Lockner Rd at 33.256110, -92.534660.

City: Old Union

County/Parish: Union County

State: Arkansas



Photo File Name: 100-0256

Orientation: WNW

Date of Photo: 07/16/2024

Time of Photo: 1003

Latitude: 33.256091

Longitude: -92.534717

Photographer: Kerri McCabe

Description: Looking WNW, this photo shows an additional view of the loose oil, saltwater, and stormwater inside the secondary containment for the main tank battery.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: B Pharr Operating, LLC – Stylite Townsend Tank Battery from Highway 63 E, then Armer Rd, at the intersection of Lockner Rd at 33.256110, -92.534660.

City: Old Union

County/Parish: Union County

State: Arkansas



Photo File Name: 100-0257

Orientation: NW

Date of Photo: 07/16/2024

Time of Photo: 1003

Latitude: 33.256100

Longitude: -92.534709

Photographer: Kerri McCabe

Description: Looking NW, this photo shows an active leak at valve and pipe within secondary containment for the main tank battery.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: B Pharr Operating, LLC – Stylite Townsend Tank Battery from Highway 63 E, then Armer Rd, at the intersection of Lockner Rd at 33.256110, -92.534660.

City: Old Union

County/Parish: Union County

State: Arkansas



Photo File Name: 100-0258

Orientation: WNW

Date of Photo: 07/16/2024

Time of Photo: 1003

Latitude: 33.256120

Longitude: -92.534700

Photographer: Kerri McCabe

Description: Looking WNW, this photo shows oil actively seeping through the secondary containment for the main tank battery.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: B Pharr Operating, LLC – Stylite Townsend Tank Battery from Highway 63 E, then Armer Rd, at the intersection of Lockner Rd at 33.256110, -92.534660.

City: Old Union

County/Parish: Union County

State: Arkansas



Photo File Name: 100-0259

Orientation: NW

Date of Photo: 07/16/2024

Time of Photo: 1003

Latitude: 33.256156

Longitude: -92.534711

Photographer: Kerri McCabe

Description: Looking NW, this photo shows a closeup of crude oil the actively leaking from the secondary containment for the main tank battery.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: B Pharr Operating, LLC – Stylite Townsend Tank Battery from Highway 63 E, then Armer Rd, at the intersection of Lockner Rd at 33.256110, -92.534660.

City: Old Union

County/Parish: Union County

State: Arkansas



Photo File Name: 100-0260

Orientation: N

Date of Photo: 07/16/2024

Time of Photo: 1003

Latitude: 33.256267

Longitude: -92.534667

Photographer: Kerri McCabe

Description: Looking N, this photo shows an additional secondary containment for an oil-water separator at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: B Pharr Operating, LLC – Stylite Townsend Tank Battery from Highway 63 E, then Armer Rd, at the intersection of Lockner Rd at 33.256110, -92.534660.

City: Old Union

County/Parish: Union County

State: Arkansas



Photo File Name: 100-0261

Orientation: NNW

Date of Photo: 07/16/2024

Time of Photo: 1003

Latitude: 33.256300

Longitude: -92.534667

Photographer: Kerri McCabe

Description: Looking NNW, this photo shows a closer view of the additional secondary containment for the oil-water separator with loose oil inside the containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: B Pharr Operating, LLC – Stylite Townsend Tank Battery from Highway 63 E, then Armer Rd, at the intersection of Lockner Rd at 33.256110, -92.534660.

City: Old Union

County/Parish: Union County

State: Arkansas



Photo File Name: 100-0262

Orientation: NNE

Date of Photo: 07/16/2024

Time of Photo: 1004

Latitude: 33.256268

Longitude: -92.534626

Photographer: Kerri McCabe

Description: Looking NNE, this photo shows the drainage path for the main tank battery in Photos No. 1 through 8.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: B Pharr Operating, LLC – Stylite Townsend Tank Battery from Highway 63 E, then Armer Rd, at the intersection of Lockner Rd at 33.256110, -92.534660.

City: Old Union

County/Parish: Union County

State: Arkansas



Photo File Name: 100-0263

Orientation: NNW

Date of Photo: 07/16/2024

Time of Photo: 1004

Latitude: 33.256280

Longitude: -92.534577

Photographer: Kerri McCabe

Description: Looking NNW, this photo shows the drainpipe for the secondary containment for the oil-water separator in Photos No. 9 through 11 without a cap or shutoff valve.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: B Pharr Operating, LLC – Stylite Townsend Tank Battery from Highway 63 E, then Armer Rd, at the intersection of Lockner Rd at 33.256110, -92.534660.

City: Old Union

County/Parish: Union County

State: Arkansas



Photo File Name: 100-0264

Orientation: NNW

Date of Photo: 07/16/2024

Time of Photo: 1004

Latitude: 33.256369

Longitude: -92.534557

Photographer: Kerri McCabe

Description: Looking NNW, this photo shows the combined drainage path for both secondary containments at the Stylite Townsend facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: B Pharr Operating, LLC – Stylite Townsend Tank Battery from Highway 63 E, then Armer Rd, at the intersection of Lockner Rd at 33.256110, -92.534660.		
City: Old Union	County/Parish: Union County	State: Arkansas



Photo File Name: 100-0265

Orientation: NNE

Date of Photo: 07/16/2024

Time of Photo: 1004

Latitude: 33.256500

Longitude: -92.534633

Photographer: Kerri McCabe

Description: Looking NNE, this photo shows erodible soils denuded of vegetation from a previous saltwater discharge to the area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: B Pharr Operating, LLC – Stylite Townsend Tank Battery from Highway 63 E, then Armer Rd, at the intersection of Lockner Rd at 33.256110, -92.534660.

City: Old Union

County/Parish: Union County

State: Arkansas



Photo File Name: 100-0266

Orientation: NNE

Date of Photo: 07/16/2024

Time of Photo: 1005

Latitude: 33.256567

Longitude: -92.534583

Photographer: Kerri McCabe

Description: Looking NNE, this photo shows a grouping of dead trees from a previous discharge of saltwater to the area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: B Pharr Operating, LLC – Stylite Townsend Tank Battery from Highway 63 E, then Armer Rd, at the intersection of Lockner Rd at 33.256110, -92.534660.

City: Old Union

County/Parish: Union County

State: Arkansas



Photo File Name: 100-0267

Orientation: N

Date of Photo: 07/16/2024

Time of Photo: 1005

Latitude: 33.256667

Longitude: -92.534300

Photographer: Kerri McCabe

Description: Looking N, this photo shows the point of entry from the drainage paths of the tank batteries into the ephemeral stream adjacent to the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: B Pharr Operating, LLC – Stylite Townsend Tank Battery from Highway 63 E, then Armer Rd, at the intersection of Lockner Rd at 33.256110, -92.534660.		
City: Old Union	County/Parish: Union County	State: Arkansas



Photo File Name: 100-0268

Orientation: NW

Date of Photo: 07/16/2024

Time of Photo: 1005

Latitude: 33.256667

Longitude: -92.534300

Photographer: Kerri McCabe

Description: Looking NW, this photo shows a closer view of the grouping of dead trees in Photo No. 15.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: B Pharr Operating, LLC – Stylite Townsend Tank Battery from Highway 63 E, then Armer Rd, at the intersection of Lockner Rd at 33.256110, -92.534660.

City: Old Union

County/Parish: Union County

State: Arkansas



Photo File Name: 100-0269

Orientation: N

Date of Photo: 07/16/2024

Time of Photo: 1007

Latitude: 33.256550

Longitude: -92.534833

Photographer: Kerri McCabe

Description: Looking N, this photo shows the signage for the Stylite Townsend #1 SWD well located onsite.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: B Pharr Operating, LLC – Stylite Townsend Tank Battery from Highway 63 E, then Armer Rd, at the intersection of Lockner Rd at 33.256110, -92.534660.		
City: Old Union	County/Parish: Union County	State: Arkansas



Photo File Name: 100-0270

Orientation: ENE

Date of Photo: 07/16/2024

Time of Photo: 1007

Latitude: 33.256554

Longitude: -92.534833

Photographer: Kerri McCabe

Description: Looking ENE, this photo shows the drainage path for the SWD in Photo No. 18. Note erodible soils denuded of vegetation from a previous saltwater discharge.