

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	3/12/2024	
Media Program:	Water	
Regulatory Program(s)	Clean Water Act	
Company Name:	RCP Production, LLC	
Facility Name:	TD Murphy B-3 SWD Tank Battery	
Facility Physical Location:	Latitude: 33.341155, Longitude: -92.690976	
(city, state, zip code)	Smackover, AR, 71762	
Mailing address:	134 Daniel Road	
(city, state, zip code)	Smackover, Arkansas, 71762	
County/Parish:	Union County	
Facility Phone Number	870-814-9942	
Facility Contact:	Rod Phillips	
	Rod_phillips2000@yahoo.com	
FRS Number:	NA	
Identification/Permit Number:	ARU002227	
Media Identifier Number:	NA	
NAICS:	211111	
SIC:	1311	
Personnel participating in inspection:		
Michael Blaha	EPA/Region 6 ECDW	Enforcement Officer/Inspector
Kerri McCabe	EPA/Region 6 ECDW	Enforcement Officer/Inspector
Uma Lad	EPA/Region 6 ECDW	Enforcement Officer/Inspector
EPA Lead Inspector Signature/Date	MICHAEL BLAHA Digitally signed by MICHAEL BLAHA Date: 2024.05.10 20:39:17 -05'00'	
	Michael Blaha	Date
Supervisor Signature/Date	JEANNE ECKHART Digitally signed by JEANNE ECKHART Date: 2024.05.10 20:54:41 -05'00'	
	Jeanne Eckhart	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Michael Blaha, Kerri McCabe, and Uma Lad arrived at the RCP Production, LLC, TD Murphy B-3 SWD Tank Battery, located off All Gulf Road in Smackover (33.341485, -92.686930) at 5:30 PM on 3/12/2024 – 3/13/2024 for an unannounced inspection. Rod Phillips was 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. On 3/13/2024 Glen Owens with Arkansas Oil and Gas Commission (AOGC) was present.

FACILITY DESCRIPTION

EPA conducted an inspection on the RCP Production, LLC, TD Murphy B-3 SWD Tank Battery which contained one tank and an injection well.

Section II - OBSERVATIONS

I observed the facility sign at the facility, see Appendix 1 (photo log), photo No. 1. For additional GPS location information and photo metadata, see Appendix 1.

I observed a spill of oil and produced water from the tank inside secondary containment, see photo No. 2.

I observed the spill releasing from the open secondary containment drainage valve behind the facility, see photo No. 3 and Appendix 2, video No. 1 and 2.

Approximately 19 minutes from the time we started the inspection, John Tarver arrived to shut the secondary containment valve stopping the release, see photo No. 4.

Behind the facility, I observed the impacted flowpath with produced water and oil in the wetland, see photo No. 5 and photo No. 6.

I observed a Total Dissolved Solids (TDS) reading of 9,258 mg/L in the wetland as well as upstream and downstream characteristics, see photo No. 7 and photo No. 9.

Working downstream in the wetland, I observed oil and sheen, see photo No. 10 and photo No. 11.

I observed a TDS reading of 30,329 mg/L in the main flowpath in the wetland as well as upstream and downstream characteristics, see photo No. 12 and photo No. 14.

Further downstream in the wetland, I observed oil gathering and sheen, see photo No. 15 and photo No. 16.

I observed a TDS reading of 25,635 mg/L further downstream in the main flowpath in the wetland, see photo No. 17.

I observed oil gathering in the wetland and sheen, see photo No. 18.

I observed the background level TDS reading of 547 mg/L upstream from the impacted water in the wetland as well as wetland characteristics, see photo No. 19 through photo No. 21.

The day after the release on 3/13/2024, I observed the facility with the updated sign and closed secondary containment valve, see photo No. 22 through photo No. 24.

At the oil lease road crossing, I observed a TDS reading of 16,101 mg/L as well as wetland characteristics, see photo No. 25 through photo No. 27.

I observed oil gathering in the wetland upstream from the oil lease road crossing, see photo No. 28.

Downstream from the oil lease road crossing, I observed a TDS reading of 2,513 mg/L as well as wetland characteristics, see photo No. 29 through photo No. 31.

Further downstream, I observed a TDS reading of 2,419 mg/L as well as wetland characteristics, see photo No. 32 through photo No. 34.

Working downstream near the Point of Entry into the unnamed tributary, I observed a TDS reading of 2,349 mg/L as well as wetland characteristics, see photo No. 35 through photo No. 37

In the unnamed tributary, I observed a TDS reading of 1,628 mg/L as well as stream characteristics, see photo No. 38 through photo No. 40.

Further downstream in the unnamed tributary, I observed a TDS reading of 1,587 mg/L as well as stream characteristics, see photo No. 41 through photo No. 43.

Downstream at the bridge crossing at All Guld Road, I observed a TDS reading of 1,554 mg/L as well as stream characteristics, see photo No. 44 through photo No. 46.

Downstream near the railroad crossing, I observed a TDS reading of 1,489 mg/L as well as stream characteristics, see photo No 47. through photo No. 49.

On 3/14/2024, I observed a boom and sheen at the oil lease road crossing, see photo No. 50.

All TDS field readings observed throughout the inspection were taken with a properly calibrated, EPA issued, YSI pro 30 conductivity meter.

On 3/12/2024, Rod Phillips flushed and vacuumed 300 barrels of fresh water.

On 3/13/2024, Rod Phillips placed a boom at the oil lease road crossing.

Section III – AREAS OF CONCERN

A closing conference was held with Mr. Rod Phillips, RCP Production, LLC; to discuss the findings of the inspection. Areas of concern at the time of the inspection include the elevated TDS readings from the surface water along the discharge conveyance.

Section IV – FOLLOW UP

Inspector will conduct follow-up phone calls with the company representatives over the coming weeks and months to ensure areas of concern are properly addressed.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 50 photos taken 3/12/2024 – 3/14/2024

Appendix 2 – Video Log – 2 videos taken on 3/12/2024

Appendix 1

Photograph Log

50 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010236

Orientation: ENE

Date of Photo: 3/12/2024

Time of Photo: 5:21 PM

Latitude: 33.341133

Longitude: -92.69103

Photographer: Michael Blaha

Description: This photo was taken looking ENE showing the facility sign.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010240

Orientation: NE

Date of Photo: 3/12/2024

Time of Photo: 5:32 PM

Latitude: 33.34111

Longitude: -92.69112

Photographer: Michael Blaha

Description: This photo was taken looking NE at the facility showing an overview of the facility and the spill source.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010242

Orientation: NE

Date of Photo: 3/12/2024

Time of Photo: 5:33 PM

Latitude: 33.341068

Longitude: -92.69092

Photographer: Michael Blaha

Description: This photo was taken looking NE showing the secondary containment discharge pipe releasing the produced water and oil from secondary containment into the nearby wetland.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010243

Orientation: N

Date of Photo: 3/12/2024

Time of Photo: 5:50 PM

Latitude: 33.341341

Longitude: -92.690912

Photographer: Michael Blaha

Description: This photo was taken looking N showing the secondary containment valve closed by John Tarver, stopping the release.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010245

Orientation: E

Date of Photo: 3/12/2024

Time of Photo: 6:22 PM

Latitude: 33.341166

Longitude: -92.690566

Photographer: Michael Blaha

Description: This photo was taken looking downstream E showing sheen on the contaminated flowpath entering the wetland behind (E) the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010246

Orientation: SW

Date of Photo: 3/12/2024

Time of Photo: 6:22 PM

Latitude: 33.341142

Longitude: -92.690525

Photographer: Michael Blaha

Description: This photo was taken looking SW showing the impacted flowpath through the wetland.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010248

Orientation: NA

Date of Photo: 3/12/2024

Time of Photo: 6:27 PM

Latitude: 33.34109

Longitude: -92.690168

Photographer: Michael Blaha

Description: This photo was taken showing a Total Dissolved Solids (TDS) reading of 9,256 mg/L in the wetland.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010249

Orientation: ENE

Date of Photo: 3/12/2024

Time of Photo: 6:27 PM

Latitude: 33.341177

Longitude: -92.690183

Photographer: Michael Blaha

Description: This photo was taken at the same location as photo No. 7 looking downstream ENE showing vegetation and topography of the wetland.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010250

Orientation: N

Date of Photo: 3/12/2024

Time of Photo: 6:28 PM

Latitude: 33.341171

Longitude: -92.690192

Photographer: Michael Blaha

Description: This photo was taken at the same location as photo No. 7 looking upstream N showing vegetation and topography of the wetland.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010251

Orientation: NE

Date of Photo: 3/12/2024

Time of Photo: 6:29 PM

Latitude: 33.34119

Longitude: -92.68998

Photographer: Michael Blaha

Description: This photo taken looking NE showing sheen in the wetland.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010256

Orientation: S

Date of Photo: 3/12/2024

Time of Photo: 6:31 PM

Latitude: 33.341098

Longitude: -92.689872

Photographer: Michael Blaha

Description: This photo is looking S showing oil collecting in the wetland.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010258

Orientation: NA

Date of Photo: 3/12/2024

Time of Photo: 6:34 PM

Latitude: 33.341355

Longitude: -92.68997

Photographer: Michael Blaha

Description: This photo was taken showing a TDS reading of 30,329 mg/L in the main flowpath in the wetland.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010263

Orientation: W

Date of Photo: 3/12/2024

Time of Photo: 6:34 PM

Latitude: 33.341355

Longitude: -92.68997

Photographer: Michael Blaha

Description: This photo was taken at the same location as photo No. 12 looking upstream W showing vegetation and topography of the wetland.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010264

Orientation: E

Date of Photo: 3/12/2024

Time of Photo: 6:34 PM

Latitude: 33.341355

Longitude: -92.68997

Photographer: Michael Blaha

Description: This photo was taken at the same location as photo No. 12 looking downstream E showing vegetation, topography, and sheen in the wetland.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010269

Orientation: NE

Date of Photo: 3/12/2024

Time of Photo: 6:40 PM

Latitude: 33.341408

Longitude: -92.689273

Photographer: Michael Blaha

Description: This photo was taken looking NE showing oil in the wetland.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R00102673

Orientation: SE

Date of Photo: 3/12/2024

Time of Photo: 6:41 PM

Latitude: 33.341393

Longitude: -92.689091

Photographer: Michael Blaha

Description: This photo was taken looking SE showing where oil has collected in the wetland.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010274

Orientation: NA

Date of Photo: 3/12/2024

Time of Photo: 6:42 PM

Latitude: 33.341466

Longitude: -92.689178

Photographer: Michael Blaha

Description: This photo was taken showing a TDS reading of 25,635 mg/L in the main flowpath in the wetland.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010275

Orientation: SSE

Date of Photo: 3/12/2024

Time of Photo: 6:47 PM

Latitude: 33.341503

Longitude: - 92.688942

Photographer: Michael Blaha

Description: This photo was taken looking SSE showing oil collecting on water in the wetland.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010276

Orientation: NA

Date of Photo: 3/12/2024

Time of Photo: 6:58 PM

Latitude: 33.340966

Longitude: -92.68997

Photographer: Michael Blaha

Description: This photo was taken showing the background TDS reading of 547 mg/L in the main flowpath upstream from the impacted segment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010277

Orientation: NE

Date of Photo: 3/12/2024

Time of Photo: 6:58 PM

Latitude: 33.340966

Longitude: -92.68997

Photographer: Michael Blaha

Description: This photo was taken at the same location as photo No. 19 looking upstream NE showing vegetation and topography of the wetland.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 21

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010278

Orientation: SW

Date of Photo: 3/12/2024

Time of Photo: 6:58 PM

Latitude: 33.340966

Longitude: -92.68997

Photographer: Michael Blaha

Description: This photo was taken at the same location as photo No. 19 looking downstream SW showing vegetation and topography of the wetland.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 22

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010280

Orientation: NE

Date of Photo: 3/13/2024

Time of Photo: 9:41 AM

Latitude: 33.34111

Longitude: -92.69112

Photographer: Michael Blaha

Description: This photo was taken looking NE at the facility showing an updated sign on the tank as well as stoppage of release.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 23

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010285

Orientation: ENE

Date of Photo: 3/13/2024

Time of Photo: 9:43 AM

Latitude: 33.34111

Longitude: -92.69096

Photographer: Michael Blaha

Description: This photo was taken looking ENE showing the impacted flowpath the day after the release.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 24

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010286

Orientation: NE

Date of Photo: 3/13/2024

Time of Photo: 9:44 AM

Latitude: 33.341068

Longitude: -92.69092

Photographer: Michael Blaha

Description: This photo was taken looking NE showing the secondary containment discharge pipe with a new valve and cap.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 25

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010292

Orientation: NA

Date of Photo: 3/13/2024

Time of Photo: 11:08 AM

Latitude: 33.341471

Longitude: -92.687035

Photographer: Michael Blaha

Description: This photo was taken showing a TDS reading of 16,101 mg/L at the oil lease road crossing a day after the release.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 26

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010290

Orientation: WNW

Date of Photo: 3/13/2024

Time of Photo: 11:03 AM

Latitude: 33.341471

Longitude: -92.687035

Photographer: Michael Blaha

Description: This photo was taken at the same location as photo No. 25 looking upstream WNW showing sheen, vegetation, and topography of the wetland.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 27

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010291

Orientation: E

Date of Photo: 3/13/2024

Time of Photo: 11:03 AM

Latitude: 33.341471

Longitude: -92.687035

Photographer: Michael Blaha

Description: This photo was taken at the same location as photo No. 25 looking downstream E showing vegetation and topography of the wetland.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 28

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010297

Orientation: NW

Date of Photo: 3/13/2024

Time of Photo: 11:22 AM

Latitude: 33.341425

Longitude: -92.688535

Photographer: Michael Blaha

Description: This photo was taken looking NW showing oil collecting in the wetland.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 29

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010312

Orientation: NA

Date of Photo: 3/13/2024

Time of Photo: 1:31 PM

Latitude: 33.34144

Longitude: -92.68677

Photographer: Michael Blaha

Description: This photo was taken showing a TDS reading of 2,513 mg/L downstream from the oil lease road crossing a day after the release.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 30

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010313

Orientation: NE

Date of Photo: 3/13/2024

Time of Photo: 1:31 PM

Latitude: 33.34144

Longitude: -92.68677

Photographer: Michael Blaha

Description: This photo was taken at the same location as photo No. 29 looking downstream NE vegetation and topography of the wetland.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 31

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010314

Orientation: NW

Date of Photo: 3/13/2024

Time of Photo: 1:31 PM

Latitude: 33.34144

Longitude: -92.68677

Photographer: Michael Blaha

Description: This photo was taken at the same location as photo No. 29 looking upstream NW vegetation and topography of the wetland.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 32

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010315

Orientation: NA

Date of Photo: 3/13/2024

Time of Photo: 1:38 PM

Latitude: 33.341685

Longitude: -92.685821

Photographer: Michael Blaha

Description: This photo was taken showing a TDS reading of 2,419 mg/L further downstream from the oil lease road crossing a day after the release.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 33

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010316

Orientation: WNW

Date of Photo: 3/13/2024

Time of Photo: 1:38 PM

Latitude: 33.341685

Longitude: -92.685821

Photographer: Michael Blaha

Description: This photo was taken at the same location as photo No. 32 looking upstream WNW vegetation and topography of the wetland.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 34

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010317

Orientation: N

Date of Photo: 3/13/2024

Time of Photo: 1:39 PM

Latitude: 33.341685

Longitude: -92.685821

Photographer: Michael Blaha

Description: This photo was taken at the same location as photo No. 32 looking downstream N vegetation and topography of the wetland.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 35

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010321

Orientation: NA

Date of Photo: 3/13/2024

Time of Photo: 1:57 PM

Latitude: 33.341215

Longitude: -92.685412

Photographer: Michael Blaha

Description: This photo was taken showing a TDS reading of 2,349 mg/L further downstream near the unnamed tributary a day after the release.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 36

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010322

Orientation: WNW

Date of Photo: 3/13/2024

Time of Photo: 1:58 PM

Latitude: 33.341215

Longitude: -92.685412

Photographer: Michael Blaha

Description: This photo was taken at the same location as photo No. 35 looking upstream WNW showing vegetation and topography of the wetland.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 37

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010323

Orientation: SE

Date of Photo: 3/13/2024

Time of Photo: 1:58 PM

Latitude: 33.341215

Longitude: -92.685412

Photographer: Michael Blaha

Description: This photo was taken at the same location as photo No. 35 looking downstream SE showing the wetlands POE into the unnamed tributary that connects to Smackover Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 38

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010327

Orientation: NA

Date of Photo: 3/13/2024

Time of Photo: 2:23 PM

Latitude: 33.34229

Longitude: -92.68521

Photographer: Michael Blaha

Description: This photo was taken showing a TDS reading of 1,628 mg/L at the point of entry (POE) into the unnamed tributary that connects to Smackover Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 39

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010328

Orientation: SE

Date of Photo: 3/13/2024

Time of Photo: 2:24 PM

Latitude: 33.34229

Longitude: -92.68521

Photographer: Michael Blaha

Description: This photo was taken at the same location as photo No. 38 looking upstream SE showing the vegetation and bed and bank features of the unnamed tributary that connects to Smackover Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 40

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010329

Orientation: NE

Date of Photo: 3/13/2024

Time of Photo: 2:24 PM

Latitude: 33.34229

Longitude: -92.68521

Photographer: Michael Blaha

Description: This photo was taken at the same location as photo No. 38 looking downstream NE showing the vegetation and bed and bank features of the unnamed tributary that connects to Smackover Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 41

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010330

Orientation: NA

Date of Photo: 3/13/2024

Time of Photo: 2:28 PM

Latitude: 33.34825

Longitude: -92.686472

Photographer: Michael Blaha

Description: This photo was taken showing a TDS reading of 1,587 mg/L further downstream from the POE into the unnamed tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 42

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010331

Orientation: NE

Date of Photo: 3/13/2024

Time of Photo: 2:29 PM

Latitude: 33.34825

Longitude: -92.686472

Photographer: Michael Blaha

Description: This photo was taken at the same location as photo No. 41 looking downstream NE showing the vegetation and bed and bank features of the unnamed tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 43

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010332

Orientation: S

Date of Photo: 3/13/2024

Time of Photo: 2:29 PM

Latitude: 33.34825

Longitude: -92.686472

Photographer: Michael Blaha

Description: This photo was taken at the same location as photo No. 41 looking upstream S showing the vegetation and bed and bank features of the unnamed tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 44

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010336

Orientation: NA

Date of Photo: 3/13/2024

Time of Photo: 3:46 PM

Latitude: 33.345925

Longitude: -92.682257

Photographer: Michael Blaha

Description: This photo was taken showing a TDS reading of 1,554 mg/L at the bridge crossing on All Gulf Road in the unnamed tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 45

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010337

Orientation: SSW

Date of Photo: 3/13/2024

Time of Photo: 3:46 PM

Latitude: 33.345925

Longitude: -92.682257

Photographer: Michael Blaha

Description: This photo was taken at the same location as photo No. 41 looking upstream SSW showing the vegetation and bed and bank features of the unnamed tributary off All Gulf Road.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 46

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010338

Orientation: NNE

Date of Photo: 3/13/2024

Time of Photo: 3:46 PM

Latitude: 33.345925

Longitude: -92.682257

Photographer: Michael Blaha

Description: This photo was taken at the same location as photo No. 41 looking downstream NNE showing the vegetation and bed and bank features of the unnamed tributary off All Gulf Road.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 47

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010306

Orientation: NA

Date of Photo: 3/13/2024

Time of Photo: 12:25 PM

Latitude: 33.348791

Longitude: -92.68093

Photographer: Michael Blaha

Description: This photo was taken showing a TDS reading of 1,489 mg/L at the railroad crossing of the unnamed tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 48

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010307

Orientation: NNW

Date of Photo: 3/13/2024

Time of Photo: 12:25 PM

Latitude: 33.348791

Longitude: -92.68093

Photographer: Michael Blaha

Description: This photo was taken at the same location as photo No. 47 looking downstream NNW showing the vegetation and bed and bank features of the unnamed tributary off the railroad crossing.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 49

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010308

Orientation: NW

Date of Photo: 3/13/2024

Time of Photo: 12:25 PM

Latitude: 33.348791

Longitude: -92.68093

Photographer: Michael Blaha

Description: This photo was taken at the same location as photo No. 47 looking downstream NW showing the vegetation and bed and bank features of the unnamed tributary off the railroad crossing.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 50

Location: 33.341133, -92.69103		
City: Smackover	County/Parish: Union	State: Arkansas



Photo File Name: R0010403

Orientation: NW

Date of Photo: 3/14/2024

Time of Photo: 12:34 PM

Latitude: 33.34141

Longitude: -92.68702

Photographer: Michael Blaha

Description: This photo was taken looking NW showing the sheen and boom off the oil lease road two days after the release.

Appendix 2

Video Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Video Log

Location: 33.341133, -92.69103		
City: Smackover	Union County	State: Arkansas

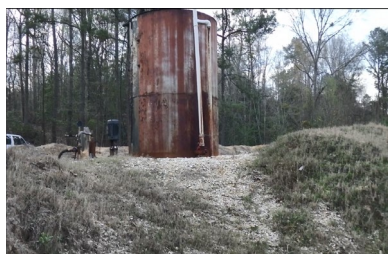
Video File Name: [R0010237.MOV](#)

Date of Video: 03/12/2024

Time of Video: 5:21 pm

Videographer: Uma Lad

Description: This video was taken looking E showing produced water and oil flowing out of the tank into secondary containment. The secondary containment valve was left open releasing the spill outside of secondary containment.

Video File Name: [R0010239.MOV](#)

Date of Video: 03/12/2024

Time of Video: 5:27 pm

Videographer: Uma Lad

Description: This video was taken looking ENE showing the produced water and oil flowing out of the open secondary containment valve flowing towards a wetland.