

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	09/08/2022	
Media Program:	Water	
Regulatory Program(s)	Clean Water Act – National Pollution Discharge Elimination System (Brine)	
Company Name:	Northcote Cleveland LLC	
Facility Name:	Osage B Lease	
Facility Physical Location:	Latitude: 36.259597, Longitude: -96.225672	
(city, state, zip code)	Prue, Oklahoma, 74060	
Mailing address:	701 S Eighth St	
(city, state, zip code)	Ponca City, Oklahoma, 74601	
County/Parish:	Osage County	
Facility Phone Number	580-304-1193	
Facility Contact:	Cody Mather	Owner/Operator
	Cody_mather@hotmail.com	
FRS Number:	n/a	
Identification/Permit Number:	OKU000856	
Media Identifier Number:	n/a	
NAICS:	211111	
SIC:	1311	
Personnel participating in inspection:		
Matthew Allen	EPA, Region 6ECDW	Inspector
Chris Laviolette	Osage Nation DNR	Inspector
Cody Mather	Northcote Cleveland, LLC	Owner/Operator
EPA Lead Inspector Signature/Date	MATTHEW ALLEN Digitally signed by MATTHEW ALLEN DN: c=US, o=U.S. Government, ou=Environmental Protection Agency, cn=MATTHEW ALLEN, 0.9.2342.19200300.100.1.1=68001004162907 Date: 2022.09.28 14:45:19 -05'00'	Date
	Matthew Allen	
Supervisor Signature/Date	JEANNE ECKHART Digitally signed by JEANNE ECKHART Date: 2022.10.05 09:06:45 -05'00'	Date
	Jeanne Eckhart (<i>acting</i>)	

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector Matthew Allen arrived at the Northcote Cleveland, LLC, Osage B Lease (EPA ID No. OKU000856), at 12:05 PM on 09/08/2022 for an announced follow up inspection. Cody Mather, owner/operator representing Northcote Cleveland, LLC was present and participated during the inspection. This was a follow up inspection, the original spill inspection was conducted by EPA Inspector, Matthew Allen on 09/03/2022 in response to a spill notification (NRC# 1346621) received from Bureau of Indian Affairs (BIA), Osage Agency, inspector, Jeff McGuire. The inspection was conducted by the authority of the Clean Water Act to determine compliance with Environmental Protection Agency (EPA) regulations. Osage Nation Department of Natural Resources (Osage DNR), Spill Prevention Control and Countermeasure (SPCC) inspector, Chris Laviolette, accepted an invitation to participate during the inspection. There were no other federal, tribal, state, or local agency representatives present at the time of the inspection.

FACILITY DESCRIPTION

EPA conducted a follow up inspection on the Northcote Cleveland, LLC, Osage B Lease. The spill originated from a 2-inch diameter poly production flowline which transported produced water (oil and saltwater) from the producing well to the oil separation/storage facility (tank battery). The Osage B Lease was located north of New Prue Road, east of the confluence of Mud Creek into Keystone Lake, in Osage County, Oklahoma.

Section II - OBSERVATIONS

Initial observations confirmed there had been no cleanup or remediation efforts completed at or near the release point of the spill, there was also no change observed along the flowpath from the release point to the Point of Entry (POE) from the initial spill inspection. During the inspection I observed an elevated TDS field reading of 80,852 mg/L at the POE into the impacted tributary which is documented in Appendix 1 (photo log) photo No. 1 (GPS 36.259417, -96.226174). A few minutes after observing the elevated TDS reading at the POE, I observed cleanup crews use a vacuum truck to remove the impacted water from the tributary, the start of that operation is evidenced in photo No. 3.

I observed floating, oil absorbent booms on the impacted tributary. These booms were located on a pool of water which was covered with oil at the time of the initial inspection, the operator had made significant progress in removing oil from the impacted tributary at this location. Oil staining on the vegetation and along the banks of the tributary was still prominent at the time of the inspection. I also observed an elevated TDS field reading of 10,145 mg/L TDS at the same location. I conveyed the need to remove the impacted water from the tributary to the operator. All these impacts were documented in photos 4, 5, 6, and 7.

I observed oil floating on the surface of the tributary, oil staining on the rocks, vegetation, and banks. The white powdery substance observed was identified by the operator as "Clean B" an industrial absorbent. These impacts were documented in photo No. 8.

I observed high water marks in the form of oil-stained vegetation as the inspection moved downstream. I also observed significant sections of the tributary where the impacted water and free-floating oil had been removed from the tributary. These observations are documented in photos 9, 10, 11, and 12.

I observed a temporary containment dam at (GPS 36.261170, -96.229526) which is documented in photo 14. This dam was not present during the initial inspection conducted 09/03/2022.

I observed an ACME Environmental employee power washing oil stains from the streambed and rocks along the impacted tributary (see photo 15). At the same location I observed a partial bag of "Clean B", the industrial absorbent which was observed having been applied at another location along the impacted tributary (photo 16). I also observed the power washing rig which was being used to clean oil stains from the impacted tributary (photo 17).

I observed a section of the impacted tributary where power washing had already occurred, there was no oil staining present in this area at the time of the inspection. This area had been sufficiently cleaned.

I observed an elevated TDS field reading of 2,299 mg/L (photo 19) taken along the impacted tributary. While this was an elevated reading, it shows significant improvement over the initial readings observed on 09/03/2022. The operator was instructed to empty this pool of water from the impacted tributary.

I observed an elevated TDS field reading of 854 mg/L taken in the last pool of water along the impacted tributary before it entered the waters of Mud Creek/Keystone Lake. I observed oil on the pool of water as well as oil staining on the rocks and vegetation around the pool. At the time of the inspection, this area had not been impacted by cleanup activities. These observations were documented in photos 20 and 21.

I observed floating oil containment booms and oil absorbent booms installed on Mud Creek/Keystone Lake. At the time of the inspection the booms had the oil captured primarily along the rip rap at the base of the earthen bridge which carried New Prue Road across Mud Creek/Keystone Lake. (See photos 22 and 23).

I observed trash sacks containing oil-soaked debris and oil-soaked cleanup materials near the shoreline along Mud Creek/Keystone Lake (photo 26).

I observed oil trapped against the shore by the containment and absorbent booms (photo 27). This area had not yet been cleaned. ACME Environmental cleanup personnel can also be seen working in the photo. The rip rap along the right side of the picture is located at the base of the earthen bridge which carried New Prue Road across Mud Creek/Keystone Lake. I observed additional booms and cleanup materials available for use at the cleanup area (photo 28). (GPS 36.258135, -96.233195).

Each of the TDS field readings taken throughout the inspection were taken with a properly calibrated YSI Pro 30 conductivity meter. All photos referenced in this narrative were included as part of Appendix 1 (photo log) which is attached to this report. Additional photos, GPS location information, time and narrative information are also included in the 28 photos of Appendix 1.

Section III – AREAS OF CONCERN

The primary areas of concern included oil and saltwater impacted waters which still need to be removed from the impacted tributary. Additional areas of concern include oil impacted streambed, rocks, and vegetation along the impacted tributary. The final area of concern was the need to clean the flowpath from the release point to the POE into the impacted tributary.

Section IV – FOLLOW UP

No additional information was received by EPA after exiting the Facility on 09/08/2022.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 28 photos taken 09/08/2022

Appendix 1

Photograph Log 28 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0736

Orientation: n/a

Date of Photo: 09/08/2022

Time of Photo: 12:13 PM

Latitude: 36.259417

Longitude: -96.226174

Photographer: Matthew Allen

Description: This was an elevated TDS field reading of 80,852 mg/L taken at the Point of Entry (POE) into the impacted, unnamed tributary. Cleanup crews removed this water from the tributary immediately after this reading was observed.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0737

Orientation: SW

Date of Photo: 09/08/2022

Time of Photo: 12:14 PM

Latitude: 36.259417

Longitude: -96.226174

Photographer: Matthew Allen

Description: This was a view looking from the POE downstream or southwest. The high-water mark is evidenced by the dark brown band of oil stained vegetation along the right hand bank of the tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0738

Orientation: N

Date of Photo: 09/08/2022

Time of Photo: 12:20 PM

Latitude: 36.259417

Longitude: -96.226174

Photographer: Matthew Allen

Description: This was the vacuum truck that emptied the impacted water from the pool of water in the main channel of the tributary at the POE.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0739

Orientation: S

Date of Photo: 09/08/2022

Time of Photo: 12:26 PM

Latitude: 36.259536

Longitude: -96.226392

Photographer: Matthew Allen

Description: This was a photo showing oil absorbent floating booms floating on the surface of the impacted tributary. This location had been 99% covered with oil at the time of the initial inspection on 09/03/2022. Significant cleanup progress was observed. Oil-stained vegetation can still be seen along the banks of the tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0740

Orientation: W

Date of Photo: 09/08/2022

Time of Photo: 12:26 PM

Latitude: 36.259536

Longitude: -96.226392

Photographer: Matthew Allen

Description: This is the same pool of water as shown in photo No. 4, just a wider view.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0741

Orientation: W

Date of Photo: 09/08/2022

Time of Photo: 12:26 PM

Latitude: 36.259536

Longitude: -96.226392

Photographer: Matthew Allen

Description: This photo showed the impacted vegetation along the banks of the tributary as well as the high-water mark as indicated by the dark brown/black ring along the bank. The dark colored soil/vegetation is a result of oil staining.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0742

Orientation: n/a

Date of Photo: 09/08/2022

Time of Photo: 12:30 PM

Latitude: 36.259536

Longitude: -96.226392

Photographer: Matthew Allen

Description: This was an elevated TDS field reading of 10,145 mg/L taken from the same pool of water shown in photos No. 4, 5, and 6.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0743

Orientation: E

Date of Photo: 09/08/2022

Time of Photo: 12:33 PM

Latitude: 36.259638

Longitude: -96.22600

Photographer: Matthew Allen

Description: Oil floating on the surface of the tributary, oil staining on the rocks, vegetation, and banks. The white powdery substance was identified by the operator as "Clean B" an industrial absorbent.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0744

Orientation: S

Date of Photo: 09/08/2022

Time of Photo: 12:35 PM

Latitude: 36.259638

Longitude: -96.22600

Photographer: Matthew Allen

Description: This was a photo of the high-water mark and oil-stained rocks and vegetation along the impacted tributary, with a view looking downstream or south. The operator had removed the free-floating oil and impacted water from this section of the tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0745

Orientation: NE

Date of Photo: 09/08/2022

Time of Photo: 12:38 PM

Latitude: 36.260081

Longitude: -96.227198

Photographer: Matthew Allen

Description: This photo shows the oil and brine impacted vegetation as well as the bed and bank features of the impacted tributary. The operator has removed the free-floating oil and impacted water from this portion of the tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0746

Orientation: SW

Date of Photo: 09/08/2022

Time of Photo: 12:38 PM

Latitude: 36.26081

Longitude: -96.227198

Photographer: Matthew Allen

Description: This was a photo showing impacted vegetation along the tributary and the bed and bank features of the impacted tributary. As with the majority of the impacted tributary, the operator has removed the impacted water along with most of the free floating oil.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0747

Orientation: SW

Date of Photo: 09/08/2022

Time of Photo: 12:41 PM

Latitude: 36.260312

Longitude: -96.228050

Photographer: Matthew Allen

Description: This photo showed the impacted vegetation along the tributary's banks, as well as oil-stained rocks along the streambed. The operator has removed the free floating oil and impacted water from the tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0748

Orientation: SW

Date of Photo: 09/08/2022

Time of Photo: 12:44 PM

Latitude: 36.260498

Longitude: -96.228557

Photographer: Matthew Allen

Description: This was a photo of oil-stained natural debris in the bed of the tributary. This should be removed as part of the cleanup operation.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0749

Orientation: N

Date of Photo: 09/08/2022

Time of Photo: 12:48 PM

Latitude: 36.261170

Longitude: -96.229526

Photographer: Matthew Allen

Description: This was a temporary containment dam installed by the operator to prevent further downstream migration of impacted waters and oil. This dam was not present during the initial inspection which was conducted on 09/03/2022.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0750

Orientation: SW

Date of Photo: 09/08/2022

Time of Photo: 12:51 PM

Latitude: 36.261573

Longitude: -96.230012

Photographer: Matthew Allen

Description: This was a photo of an ACME Environmental employee power washing the oil stains from the streambed and rocks along the impacted tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0751

Orientation: n/a

Date of Photo: 09/08/2022

Time of Photo: 12:52

Latitude: 36.261573

Longitude: -96.230012

Photographer: Matthew Allen

Description: This was the bag of "Clean B" industrial absorbent which had been applied to the oil in the tributary in photo No. 8 of this photo log.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0752

Orientation: NW

Date of Photo: 09/08/2022

Time of Photo: 12:53 PM

Latitude: 36.261573

Longitude: -96.230012

Photographer: Matthew Allen

Description: This was the power washing rig used to power was oil stains from the impacted tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0753

Orientation: SW

Date of Photo: 09/08/2022

Time of Photo: 12:55 PM

Latitude: 36.262048

Longitude: -96.230790

Photographer: Matthew Allen

Description: This was a section of the impacted tributary where power washing had already occurred, there was no oil staining present in this area at the time of the inspection. This area had been sufficiently cleaned.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0754

Orientation: n/a

Date of Photo: 09/08/2022

Time of Photo: 12:57 PM

Latitude: 36.262085

Longitude: -96.230875

Photographer: Matthew Allen

Description: This was an elevated TDS field reading of 2,299 mg/L taken along the impacted tributary. While this was an elevated reading, it shows significant improvement over the initial readings observed on 09/03/2022. The operator was instructed to empty this pool of water from the impacted tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0755

Orientation: n/a

Date of Photo: 09/08/2022

Time of Photo: 1:02 PM

Latitude: 36.262086

Longitude: -96.231868

Photographer: Matthew Allen

Description: This was an elevated TDS field reading of 854 mg/L taken in the last pool of water along the impacted tributary before it entered the waters of Mud Creek/Keystone Lake.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 21

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0756

Orientation: S

Date of Photo: 09/08/2022

Time of Photo: 1:03 PM

Latitude: 36.262086

Longitude: -96.231868

Photographer: Matthew Allen

Description: This was the pool of water where the TDS field reading of 854 mg/L was taken. There was a small amount of oil on the pool and oil-stained rocks and vegetation we present around the pool. Cleanup efforts had not yet reached this portion of the tributary at the time of the inspection.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 22

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0760

Orientation: W

Date of Photo: 09/08/2022

Time of Photo: 2:26 PM

Latitude: 36.258040

Longitude: -96.232234

Photographer: Matthew Allen

Description: This was a wide-angle view of the containment and absorbent booms installed on Mud Creek/Keystone Lake.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 23

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0761

Orientation: N

Date of Photo: 09/08/2022

Time of Photo: 2:26 PM

Latitude: 36.258040

Longitude: -96.232234

Photographer: Matthew Allen

Description: This was a wide angle view of the containment and absorbent booms installed on Mud Creek/Keystone Lake.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 24

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



File Name: DSCN0762

Orientation: SW

Date of Photo: 09/08/2022

Time of Photo: 2:28 PM

Latitude: 36.258040

Longitude: -96.232234

Photographer: Matthew Allen

Description: This was a photo of the floating oil containment boom, floating oil absorbent boom and a gasoline powered wash pump floating on Mud Creek/Keystone Lake. The oil, sheen and contaminated area was located between the booms and rip rap (rocks). This is the area where ACME Environmental had trapped the oil and was conducting cleanup and removal operations. At the time of the inspection, Cody Mather stated 11 gallons of oil had been removed from Mud Creek/Keystone Lake.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 25

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0763

Orientation: n/a

Date of Photo: 09/08/2022

Time of Photo: 2:29 PM

Latitude: 36.258040

Longitude: -96.232234

Photographer: Matthew Allen

Description: This was an area that was being clean by ACME Environmental. There were a few rocks which still had oil staining present but most of the rocks had been cleaned at the time of the inspection. ACME Environmental was using a pressure wash pump to clean the oil from the rocks.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 26

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



File Name: DSCN0764

Orientation: SW

Date of Photo: 09/08/2022

Time of Photo: 2:30 PM

Latitude: 36.258154

Longitude: -96.231893

Photographer: Matthew Allen

Description: This was a photo of trash sacks which contained oil soaked debris and oil soaked cleanup materials.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 27

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0765

Orientation: NE

Date of Photo: 09/08/2022

Time of Photo: 2:34 PM

Latitude: 36.258135

Longitude: -96.233195

Photographer: Matthew Allen

Description: This was a photo showing the oil trapped against the shore by the containment and absorbent booms. This area had not yet been cleaned. ACME Environmental cleanup personnel can also be seen working in the photo. The rip rap along the right side of the picture is located at the base of the earthen bridge which carried New Prue Road across Mud Creek/Keystone Lake.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 28

Location: 36.259597, -96.225672		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: DSCN0766

Orientation: NW

Date of Photo: 09/08/2022

Time of Photo: 2:34 PM

Latitude: 36.258135

Longitude: -96.233195

Photographer: Matthew Allen

Description: This was a photo of additional booms and cleanup materials available for use at the cleanup area. The boat pictured was used to set the containment booms and transport workers to and from the location.