

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:	Rebel Producing, LLC	
Facility Name:	Exxon Lease Tank Battery	
Facility Physical Location:	From Highway 82 East, thence New London Rd, off Winchester Rd at 33.180500, -92.314600.	
(city, state, zip code)	Strong, AR 71765	
Mailing address:	366 Burnside Farm Road	
(city, state, zip code)	Spearsville, LA 71277	
County/Parish:	Union County	
Facility Phone Number	870-312-2520	
Facility Contact:	David M. Burnside davidmburnside55@gmail.com	Person Responsible for Operation
FRS Number:	N/A	
Identification/Permit Number:	ARU002245	
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
David Burnside	Rebel Producing, LLC	Owner / Operator
EPA Lead Inspector Signature/Date		
	Kerri McCabe	Date
Supervisor Signature/Date		
	Jeanne Eckhart	Date

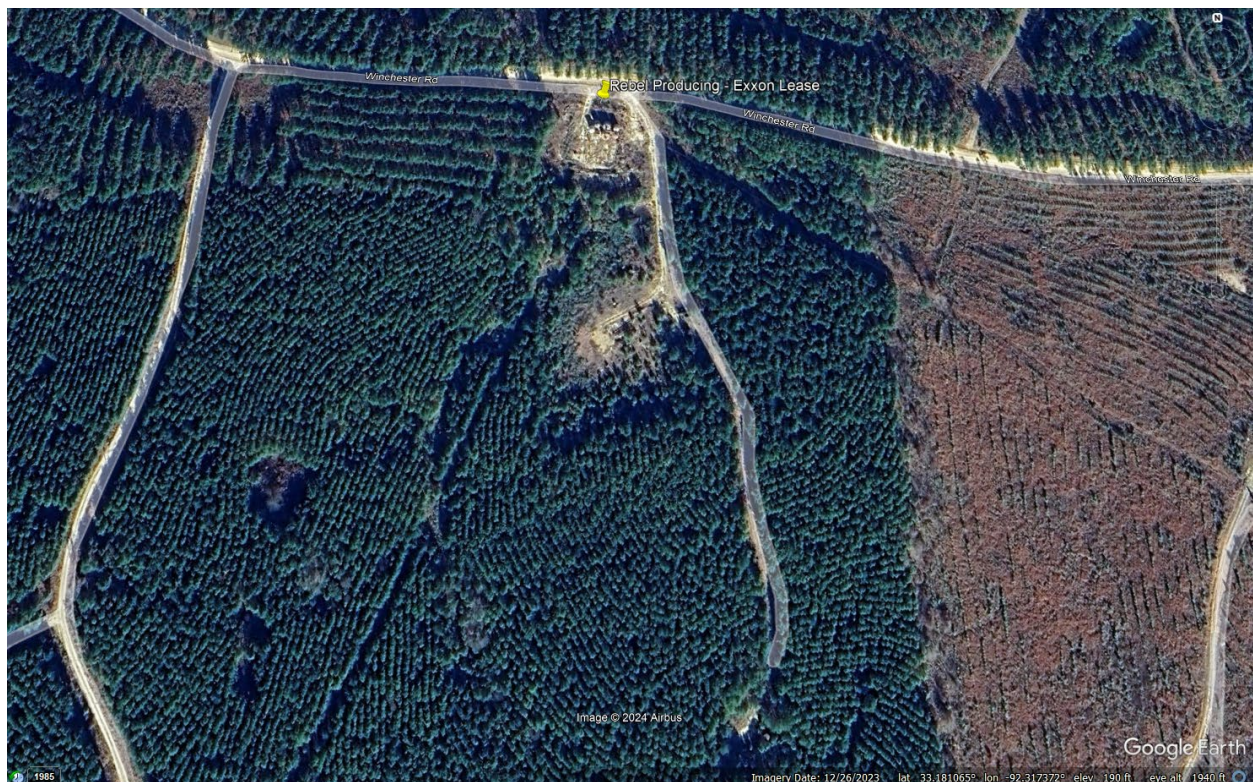
Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Kerri McCabe (lead) and Michael Blaha arrived at the Rebel Producing, LLC / Exxon Lease Tank Battery, located from Highway 82 East, thence New London Road, off Winchester Road at 33.180500, -92.314600; at 1100 on 07/16/2024 for a follow-up inspection requested by the owner / operator. Mr. David Burnside, Rebel Producing, LLC, 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. There were no other federal, state, or local agency representatives present at the time of the inspection. The facility was last inspected on 04/04/2024 by Inspector Kerri McCabe.

FACILITY DESCRIPTION

EPA conducted an inspection on the Rebel Producing, LLC / Exxon Lease Tank Battery, which contains two (2) oil-water separators, five (5) storage tanks, two (2) saltwater disposal (SWD) wells, and one (1) crude oil production well. The tank battery is for two (2) different leases operated by Rebel Producing, LLC.



Map 1. Aerial imagery (Google Earth dated 12/26/2023) of the Rebel Producing, LLC – Exxon Lease Tank Battery.

Section II - OBSERVATIONS

I observed the facility sign, secondary containment, oil-water separators, pipes and valves, and storage tanks located at the facility; see Appendix 1 (Photograph Log), Photo No. 1. For additional GPS location and photo metadata, see Appendix 1.

I observed an attempt to remove residual, solidified oil from the secondary containment berm, and a 55-gallon barrel used as a catch bucket for the transfer pipe, see Photo No. 2.

I observed the removal of woody vegetation from the secondary containment berm, see Photo No. 3.

I observed a small container placed under the leaking valve inside secondary containment, see Photo No. 4.

I observed a repair to a saltwater tank that had been leaking during the 04/04/2024 inspection, see Photo No. 5.

I observed the drainpipe for secondary containment with a cap and a closed shutoff valve, see Photo No. 6.

Section III – AREAS OF CONCERN

A closing conference was held with Mr. David Burnside, Rebel Producing, LLC. Mr. Burnside addressed a few areas of concern noted during the 04/04/2024 inspection. Compliance assistance was conducted by EPA inspectors regarding SPCC referral and requirements under that program. Areas of concern at the time of the inspection include:

- A 55-gallon barrel used for the transfer pipe outside secondary containment was not stabilized,
- Woody vegetation observed inside secondary containment and a low area in the secondary containment, and
- An active leak of crude oil at a valve inside secondary containment.

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 – 6 photos taken 07/16/2024.

Appendix 1

Photograph Log 6 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Rebel Producing, LLC / Exxon Lease Tank Battery, located from Highway 82 East, thence New London Rd, off Winchester Rd at 33.180500, -92.314600.

City: Strong

County/Parish: Union County

State: Arkansas



Photo File Name: 100-0271

Orientation: W

Date of Photo: 07/16/2024

Time of Photo: 1109

Latitude: 33.180350

Longitude: -92.314500

Photographer: Kerri McCabe

Description: Looking W, overview of facility and signage.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Rebel Producing, LLC / Exxon Lease Tank Battery, located from Highway 82 East, thence New London Rd, off Winchester Rd at 33.180500, -92.314600.

City: Strong

County/Parish: Union County

State: Arkansas



Photo File Name: 100-0272

Orientation: SW

Date of Photo: 07/16/2024

Time of Photo: 1109

Latitude: 33.180375

Longitude: -92.314451

Photographer: Kerri McCabe

Description: Looking SW, 55-gal barrel installed at transfer pipe to catch oil during transport. Straw bales in photo were used to absorb loose oil inside secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Rebel Producing, LLC / Exxon Lease Tank Battery, located from Highway 82 East, thence New London Rd, off Winchester Rd at 33.180500, -92.314600.		
City: Strong	County/Parish: Union County	State: Arkansas



Photo File Name: 100-0273

Orientation: NW

Date of Photo: 07/16/2024

Time of Photo: 1109

Latitude: 33.180389

Longitude: -92.314451

Photographer: Kerri McCabe

Description: Looking NW, woody vegetation removed from secondary containment berm.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Rebel Producing, LLC / Exxon Lease Tank Battery, located from Highway 82 East, thence New London Rd, off Winchester Rd at 33.180500, -92.314600.

City: Strong

County/Parish: Union County

State: Arkansas



Photo File Name: 100-0274

Orientation: W

Date of Photo: 07/16/2024

Time of Photo: 1109

Latitude: 33.180400

Longitude: -92.314518

Photographer: Kerri McCabe

Description: Looking W, loose oil from a leaking valve inside secondary containment. Mr. Burnside has placed a small catch bucket under the leaking valve.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Rebel Producing, LLC / Exxon Lease Tank Battery, located from Highway 82 East, thence New London Rd, off Winchester Rd at 33.180500, -92.314600.

City: Strong

County/Parish: Union County

State: Arkansas



Photo File Name: 100-0275

Orientation: ESE

Date of Photo: 07/16/2024

Time of Photo: 1110

Latitude: 33.180400

Longitude: -92.314518

Photographer: Kerri McCabe

Description: Looking ESE, area of a previous saltwater leak, which has been repaired by Mr. Burnside.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Rebel Producing, LLC / Exxon Lease Tank Battery, located from Highway 82 East, thence New London Rd, off Winchester Rd at 33.180500, -92.314600.

City: Strong

County/Parish: Union County

State: Arkansas



Photo File Name: 100-0276

Orientation: NE

Date of Photo: 07/16/2024

Time of Photo: 1111

Latitude: 33.180400

Longitude: -92.314518

Photographer: Kerri McCabe

Description: Looking NE, the drainpipe for secondary containment with a cap and a closed shutoff valve.