

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	03/05/2025	
Media Program:	Water (CWA)	
Regulatory Program(s)	Water (CWA) Brine Program (Oil & Gas inspection)	
Company Name:	Nevada Oil, LLC	
Facility Name:	Irma Nacatoch (Sand) Unit Tank Battery	
Facility Physical Location:	From Willisville, State Highway 371 North, right on Hwy 76, and then right onto an oilfield lease road at 33.545952, -93.218989.	
(city, state, zip code)	Willisville, AR 71730	
Mailing address:	451 North Washington	
(city, state, zip code)	El Dorado, AR 71864	
County/Parish:	Nevada County	
Facility Phone Number	870-862-9950	
Facility Contact:	Michael L. Burns (870-310-1501)	Person Responsible for Operation
	hrowan@ecgcpa.com	
FRS Number:	N/A	
Identification/Permit Number:	ARU002289	
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

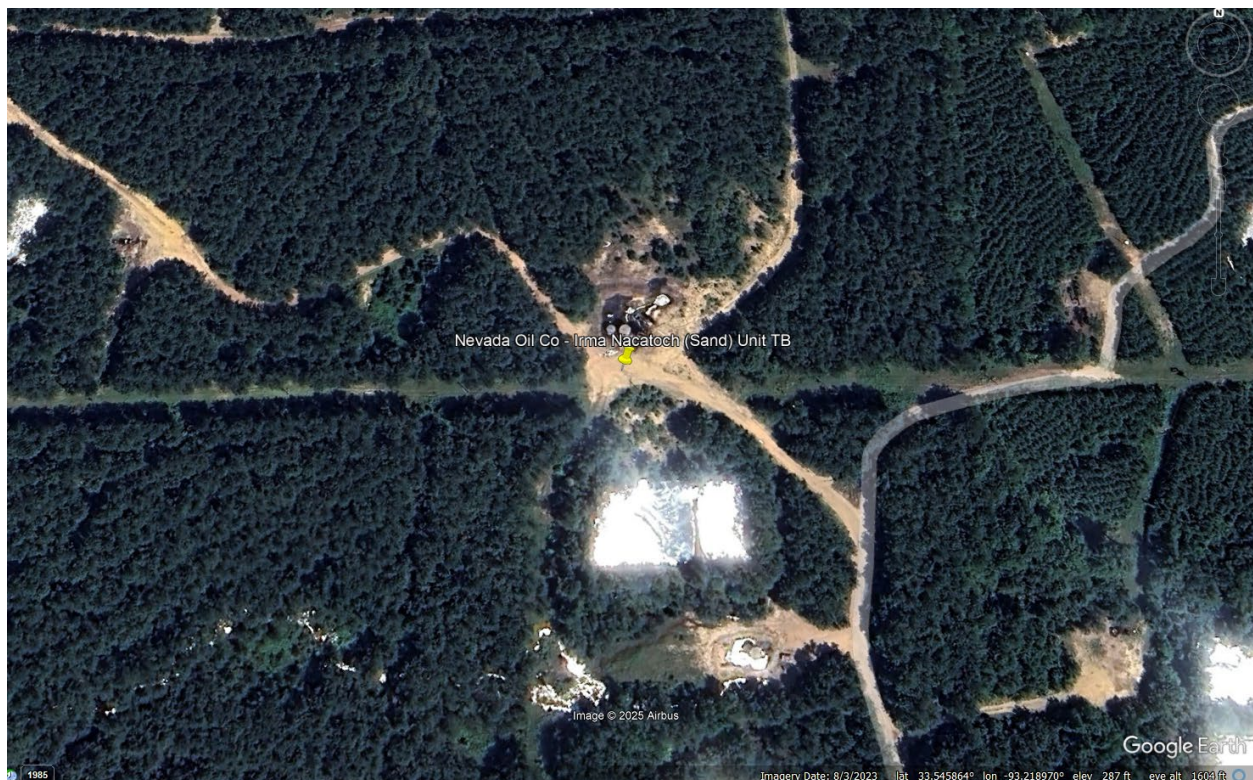
Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Kerri McCabe (lead) and Michael Blaha arrived at the Nevada Oil, LLC / Irma Nacatoch (Sand) Unit Tank Battery (“facility”) located from State Highway 371 North, right on Hwy 76, and then right onto an oilfield lease road at 33.545952, -93.218989 in Willisville, Nevada County, Arkansas; at 1305 on 03/05/2025 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 Nevada Oil, LLC / Irma Nacatoch (Sand) Unit Tank Battery facility, which contains two (2) tanks for crude oil and saltwater storage, one (1) treater, one (1) separator, and one (1) open-top tank for oil skimming.



Map 1. Aerial imagery (Google Earth dated 08/03/2023) of the Nevada Oil, LLC / Irma Nacatoch (Sand) Unit Tank Battery facility.

Section II - OBSERVATIONS

I observed the facility signage, secondary containment, treater/separator, pipes and valves, storage tanks, and an open-top skimmer for the facility; see Appendix 1 (Photographs Log), Photos No. 1 through No. 3, Photo No. 6, and Photo No. 9. For additional GPS location and photo metadata, see Appendix 1.

I observed product transfer lines without catchment buckets outside secondary containment, see Photos No. 2 and No. 3.

I observed loose crude oil and saltwater inside secondary containment, see Photos No. 4 through No. 7 and Photo No. 11.

I observed pits and a drainage channel excavated inside secondary containment, see Photos No. 7 and No. 8.

I observed an open-top tank used to skim or separate crude oil from saltwater, see Photos No. 5 and No. 6 and Photos No. 8 and No. 9.

I observed PVC piping connected to the open-top tank passing through the berm of the secondary containment directed towards the offsite saltwater disposal (SWD) injection well, see Photos No. 9 and No. 10.

Section III – AREAS OF CONCERN

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

- The product transfer lines outside secondary containment without catchment buckets (Photos No. 2 and No. 3),
- Loose crude oil and saltwater inside secondary containment (Photos No. 4 through No. 7, and No. 11), and
- Pit and conveyance excavated inside the secondary containment acting as storage (Photos No. 7 and No. 8).

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 – 11 photos taken 03/05/2025.

Appendix 1

Photograph Log 11 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: From Willisville (Waterloo Community), State Hwy 371, right on Hwy 76, then right onto oilfield lease road at 33.545952, -93.218989.		
City: Willisville (Waterloo)	County/Parish: Nevada	State: Arkansas



Photo File Name: 100-0727

Orientation: 41° NE

Date of Photo: 03/05/2025

Time of Photo: 1312

Latitude: 33.546133

Longitude: -93.219000

Photographer: Kerri McCabe

Description: Looking NE, this photo shows identification for the Irma Nacatoch (Sand) Unit Tank Battery ("facility").



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: From Willisville (Waterloo Community), State Hwy 371, right on Hwy 76, then right onto oilfield lease road at 33.545952, -93.218989.

City: Willisville (Waterloo)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0728

Orientation: 60° ENE

Date of Photo: 03/05/2025

Time of Photo: 1313

Latitude: 33.545950

Longitude: -93.219017

Photographer: Kerri McCabe

Description: Looking ENE, this photo shows an overview of the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: From Willisville (Waterloo Community), State Hwy 371, right on Hwy 76, then right onto oilfield lease road at 33.545952, -93.218989.

City: Willisville (Waterloo)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0729

Orientation: 80° E

Date of Photo: 03/05/2025

Time of Photo: 1313

Latitude: 33.546017

Longitude: -93.219117

Photographer: Kerri McCabe

Description: Looking E, this photo shows a front view of the outside of the secondary containment with transfer lines through the berm.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: From Willisville (Waterloo Community), State Hwy 371, right on Hwy 76, then right onto oilfield lease road at 33.545952, -93.218989.

City: Willisville (Waterloo)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0730

Orientation: 82° E

Date of Photo: 03/05/2025

Time of Photo: 1313

Latitude: 33.546083

Longitude: -93.219117

Photographer: Kerri McCabe

Description: Looking E, this photo shows a front view of the inside of the secondary containment with loose crude oil present.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: From Willisville (Waterloo Community), State Hwy 371, right on Hwy 76, then right onto oilfield lease road at 33.545952, -93.218989.		
City: Willisville (Waterloo)	County/Parish: Nevada	State: Arkansas



Photo File Name: 100-0731

Orientation: 72° ENE

Date of Photo: 03/05/2025

Time of Photo: 1313

Latitude: 33.546117

Longitude: -93.219117

Photographer: Kerri McCabe

Description: Looking ENE, this photo shows a sideview of the inside of the secondary containment with loose crude oil and saltwater present.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: From Willisville (Waterloo Community), State Hwy 371, right on Hwy 76, then right onto oilfield lease road at 33.545952, -93.218989.

City: Willisville (Waterloo)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0732

Orientation: 124° SE

Date of Photo: 03/05/2025

Time of Photo: 1314

Latitude: 33.546233

Longitude: -93.219067

Photographer: Kerri McCabe

Description: Looking SE, this photo shows a view of the backside of the inside of the secondary containment with loose crude oil and saltwater present.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: From Willisville (Waterloo Community), State Hwy 371, right on Hwy 76, then right onto oilfield lease road at 33.545952, -93.218989.

City: Willisville (Waterloo)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0733

Orientation: 117° ESE

Date of Photo: 03/05/2025

Time of Photo: 1314

Latitude: 33.546233

Longitude: -93.218817

Photographer: Kerri McCabe

Description: Looking ESE, this photo shows a pit or sump area excavated inside the secondary containment holding crude oil.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: From Willisville (Waterloo Community), State Hwy 371, right on Hwy 76, then right onto oilfield lease road at 33.545952, -93.218989.

City: Willisville (Waterloo)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0734

Orientation: 185° S

Date of Photo: 03/05/2025

Time of Photo: 1315

Latitude: 33.546217

Longitude: -93.218750

Photographer: Kerri McCabe

Description: Looking S, this photo shows an excavated drainage for the pit or sump area inside the secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: From Willisville (Waterloo Community), State Hwy 371, right on Hwy 76, then right onto oilfield lease road at 33.545952, -93.218989.

City: Willisville (Waterloo)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0735

Orientation: 59° ENE

Date of Photo: 03/05/2025

Time of Photo: 1315

Latitude: 33.546133

Longitude: -93.218867

Photographer: Kerri McCabe

Description: Looking ENE, this photo shows an open-top tank used as skimmer inside secondary containment. The white PVC piping is directed towards the Irma Nacatoch Unit saltwater disposal (SWD) inject well or an Enhanced Oil Recovery (EOR) well.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: From Willisville (Waterloo Community), State Hwy 371, right on Hwy 76, then right onto oilfield lease road at 33.545952, -93.218989.

City: Willisville (Waterloo)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0736

Orientation: 82° E

Date of Photo: 03/05/2025

Time of Photo: 1316

Latitude: 33.546133

Longitude: -93.218867

Photographer: Kerri McCabe

Description: Looking E, this photo shows the white PVC piping from Photo No. 9 directed towards the Irma Nacatoch Unit SWD/EOR well downgradient.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: From Willisville (Waterloo Community), State Hwy 371, right on Hwy 76, then right onto oilfield lease road at 33.545952, -93.218989.

City: Willisville (Waterloo)

County/Parish: Nevada

State: Arkansas



Photo File Name: 100-0737

Orientation: 321° NW

Date of Photo: 03/05/2025

Time of Photo: 1316

Latitude: 33.546067

Longitude: -93.218867

Photographer: Kerri McCabe

Description: Looking NW, this photo shows a front view of the inside of the secondary containment with loose crude oil and saltwater present.