

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	11/08/2024	
Media Program:	Water (CWA)	
Regulatory Program(s)	Water (CWA) Brine Program (Oil & Gas inspection)	
Company Name:	Corley Trust, LLC	
Facility Name:	Wilson #7 SWD Tank Battery	
Facility Physical Location:	In Smackover (Sandyland) from Highway 7 N, then right onto Hwy 7B, right onto Gas Plant Rd, continuing left on Gas Plant Rd, and left onto an oil lease road at 33.353841, -92.692327.	
(city, state, zip code)	Smackover, AR, 71762	
Mailing address:	410 W. 6th	
(city, state, zip code)	Smackover, AR, 71762	
County/Parish:	Union County	
Facility Phone Number	870-725-3928	
Facility Contact:	Jeff Corley (501-920-5869)	Person Responsible for Operation
	corleytrust@att.net	
FRS Number:	N/A	
Identification/Permit Number:	ARU002260	
Media Identifier Number:	N/A	
NAICS:	211111	
SIC:	1311	
Personnel participating in inspection:		
Kerri McCabe (lead)	EPA / Region 6 ECDW	Inspector / Enforcement Officer
EPA Lead Inspector Signature/Date		
	Kerri McCabe	Date
Supervisor Signature/Date		
	Jeanne Eckhart	Date

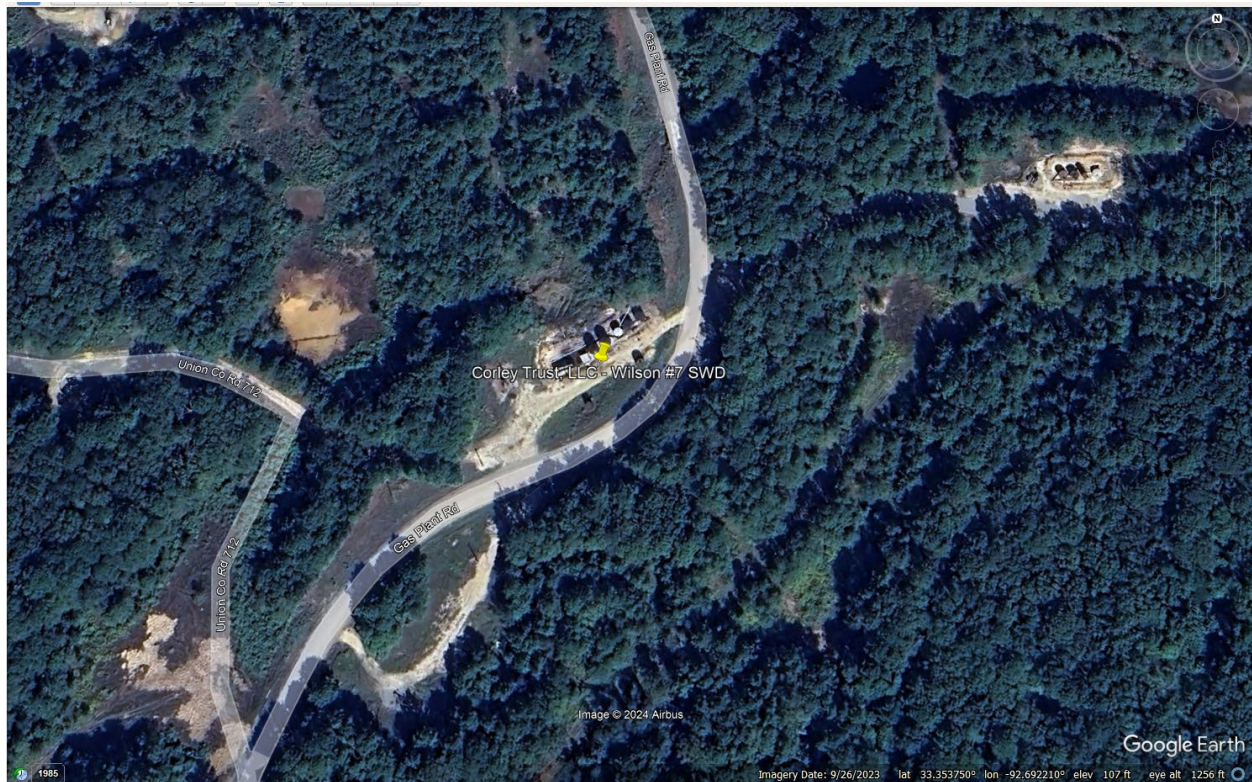
Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector Kerri McCabe (lead) arrived at the Corley Trust, LLC / Wilson #7 SWD Tank Battery (“facility”), at 0945 on 11/08/2024 for an unannounced follow-up inspection. The facility is located from Highway 7 N, then right onto Hwy 7B, right onto Gas Plant Rd, continuing left on Gas Plant Rd, and left onto an oil lease road at 33.353841, -92.692327. 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. The facility was originally inspected by Inspector Uma Lad on 10/07/2024.

FACILITY DESCRIPTION

EPA conducted an inspection on the Corley Trust, LLC / Wilson #7 SWD Tank Battery, which contained six (6) in service storage tanks/separators for crude oil and saltwater, two out of service tanks/separators, one production well (Wilson #5), and one (1) Saltwater Disposal (SWD) well (Wilson #7).



Map 1. Aerial imagery (Google Earth dated 09/26/2023) of the Corley Trust, LLC / Wilson #7 SWD Tank Battery facility.

Section II - OBSERVATIONS

I observed the Corley Trust, LLC / Wilson #7 SWD Tank Battery facility, signage, and associated secondary containment, storage tanks, separators/treaters, production well, and saltwater disposal (SWD) well; see Appendix 1 (Photograph Log), Photo No. 1 and No. 2. For additional GPS location and photo metadata, see Appendix 1.

I observed loose oil inside secondary containment, see Photo No. 3, No. 4, and No. 12.

I observed the SWD well (Wilson #7), see Photo No. 5.

I observed transfer pipes outside secondary containment without catchment buckets and loose oil on the ground around the pipes, see Photo No. 6 through No. 8.

I observed the area of the workover pit that was identified from the 10/07/2024 inspection, see Photo No. 9, No. 10, No. 13, and No. 14.

I observed the drainpipe for secondary containment with a cap and closed valve, see Photo No. 11.

I observed a production well (Wilson #5) with minor residual oil staining on the ground, see Photo No. 15.

I observed two “out of service” storage tanks without proper labeling, see Photo No. 16 and No. 17.

Section III – AREAS OF CONCERN

No closing conference was held due to no personnel with Corley Trust, LLC being present during the inspection. The operator was notified by the Arkansas Oil and Gas Commission (AOGC) on 10/09/2024. Areas of concern at the time of the inspection include the following:

- Loose, residual oil inside and outside secondary containment for the facility,
- Transfer pipes outside secondary containment without catchment buckets,
- Minor residual oil staining around a production well (Wilson #5) onsite, and
- Two tanks without proper “out of service” labeling outside 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 – 17 photos taken 11/08/2024.

Appendix 1

Photograph Log

17 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: In Smackover (Sandyland) from Highway 7 N, then right onto Hwy 7B, right onto Gas Plant Rd, continuing left on Gas Plant Rd, and left onto an oil lease road at 33.353841, -92.692327.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: 100-0299

Orientation: 28° NNE

Date of Photo: 11/08/2024

Time of Photo: 1028

Latitude: 33.353650

Longitude: -92.692350

Photographer: Kerri McCabe

Description: Looking NNE, this photo shows the signage at the Wilson #7 Saltwater Disposal (SWD) well tank battery ("facility").



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: In Smackover (Sandyland) from Highway 7 N, then right onto Hwy 7B, right onto Gas Plant Rd, continuing left on Gas Plant Rd, and left onto an oil lease road at 33.353841, -92.692327.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: 100-0300

Orientation: 65° ENE

Date of Photo: 11/08/2024

Time of Photo: 1029

Latitude: 33.353683

Longitude: -92.692531

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: In Smackover (Sandyland) from Highway 7 N, then right onto Hwy 7B, right onto Gas Plant Rd, continuing left on Gas Plant Rd, and left onto an oil lease road at 33.353841, -92.692327.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: 100-0301

Orientation: 65° ENE

Date of Photo: 11/08/2024

Time of Photo: 1029

Latitude: 33.353834

Longitude: -92.692505

Photographer: Kerri McCabe

Description: Looking ENE, this photo shows loose oil inside secondary containment at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: In Smackover (Sandyland) from Highway 7 N, then right onto Hwy 7B, right onto Gas Plant Rd, continuing left on Gas Plant Rd, and left onto an oil lease road at 33.353841, -92.692327.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: 100-0302

Orientation: 338° NNW

Date of Photo: 11/08/2024

Time of Photo: 1030

Latitude: 33.353917

Longitude: -92.692550

Photographer: Kerri McCabe

Description: Looking NNW, this photo shows the flowpath to the drainpipe inside secondary containment at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: In Smackover (Sandyland) from Highway 7 N, then right onto Hwy 7B, right onto Gas Plant Rd, continuing left on Gas Plant Rd, and left onto an oil lease road at 33.353841, -92.692327.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: 100-0303

Orientation: 46° NE

Date of Photo: 11/08/2024

Time of Photo: 1030

Latitude: 33.353800

Longitude: -92.692383

Photographer: Kerri McCabe

Description: Looking NE, this photo shows the Wilson #7 SWD well located at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: In Smackover (Sandyland) from Highway 7 N, then right onto Hwy 7B, right onto Gas Plant Rd, continuing left on Gas Plant Rd, and left onto an oil lease road at 33.353841, -92.692327.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: 100-0304

Orientation: 52° NE

Date of Photo: 11/08/2024

Time of Photo: 1030

Latitude: 33.353900

Longitude: -92.692283

Photographer: Kerri McCabe

Description: Looking NE, this photo shows the front view of the facility with transfer pipes lacking catchment buckets and loose oil on the ground outside the secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: In Smackover (Sandyland) from Highway 7 N, then right onto Hwy 7B, right onto Gas Plant Rd, continuing left on Gas Plant Rd, and left onto an oil lease road at 33.353841, -92.692327.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: 100-0305

Orientation: 29° NNE

Date of Photo: 11/08/2024

Time of Photo: 1030

Latitude: 33.353909

Longitude: -92.692265

Photographer: Kerri McCabe

Description: Looking NNE, this photo shows one of two transfer pipes without catchment bucket and loose oil outside secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: In Smackover (Sandyland) from Highway 7 N, then right onto Hwy 7B, right onto Gas Plant Rd, continuing left on Gas Plant Rd, and left onto an oil lease road at 33.353841, -92.692327.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: 100-0306

Orientation: 26° NNE

Date of Photo: 11/08/2024

Time of Photo: 1030

Latitude: 33.354100

Longitude: -92.692300

Photographer: Kerri McCabe

Description: Looking NNE, this photo shows two of two transfer pipes without catchment bucket and loose oil outside secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: In Smackover (Sandyland) from Highway 7 N, then right onto Hwy 7B, right onto Gas Plant Rd, continuing left on Gas Plant Rd, and left onto an oil lease road at 33.353841, -92.692327.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: 100-0308

Orientation: 169° S

Date of Photo: 11/08/2024

Time of Photo: 1031

Latitude: 33.354133

Longitude: -92.692283

Photographer: Kerri McCabe

Description: Looking S, this photo shows the closure of a workover pit that was identified at the facility during the 10/07/2024 inspection conducted by Inspector Uma Lad.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: In Smackover (Sandyland) from Highway 7 N, then right onto Hwy 7B, right onto Gas Plant Rd, continuing left on Gas Plant Rd, and left onto an oil lease road at 33.353841, -92.692327.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: 100-0309

Orientation: 64° ENE

Date of Photo: 11/08/2024

Time of Photo: 1031

Latitude: 33.354133

Longitude: -92.692250

Photographer: Kerri McCabe

Description: Looking ENE, this photo shows the bridge (background) at Gas Plant Rd that crosses Holmes Creek, which is adjacent to the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: In Smackover (Sandyland) from Highway 7 N, then right onto Hwy 7B, right onto Gas Plant Rd, continuing left on Gas Plant Rd, and left onto an oil lease road at 33.353841, -92.692327.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: 100-0310

Orientation: 106° ENE

Date of Photo: 11/08/2024

Time of Photo: 1032

Latitude: 33.353917

Longitude: -92.692500

Photographer: Kerri McCabe

Description: Looking ENE, this photo shows the drainpipe for secondary containment; the valve was closed and capped.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: In Smackover (Sandyland) from Highway 7 N, then right onto Hwy 7B, right onto Gas Plant Rd, continuing left on Gas Plant Rd, and left onto an oil lease road at 33.353841, -92.692327.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: 100-0311

Orientation: 113° ESE

Date of Photo: 11/08/2024

Time of Photo: 1032

Latitude: 33.353883

Longitude: -92.692567

Photographer: Kerri McCabe

Description: Looking ESE, this photo shows the pump for the SWD, loose oil, and flow indicators inside secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: In Smackover (Sandyland) from Highway 7 N, then right onto Hwy 7B, right onto Gas Plant Rd, continuing left on Gas Plant Rd, and left onto an oil lease road at 33.353841, -92.692327.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: 100-0312

Orientation: 41° NE

Date of Photo: 11/08/2024

Time of Photo: 1033

Latitude: 33.353900

Longitude: -92.692583

Photographer: Kerri McCabe

Description: Looking NE, this photo shows an additional view of the area where a workover pit was located during the 10/07/2024 inspection of the facility



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: In Smackover (Sandyland) from Highway 7 N, then right onto Hwy 7B, right onto Gas Plant Rd, continuing left on Gas Plant Rd, and left onto an oil lease road at 33.353841, -92.692327.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: 100-0313

Orientation: 55° NE

Date of Photo: 11/08/2024

Time of Photo: 1033

Latitude: 33.353917

Longitude: -92.692600

Photographer: Kerri McCabe

Description: Looking NE, this photo shows the area from Photo No. 13 that has been covered, grated, and seeded. Emerging seedlings were noted at the time of the inspection.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: In Smackover (Sandyland) from Highway 7 N, then right onto Hwy 7B, right onto Gas Plant Rd, continuing left on Gas Plant Rd, and left onto an oil lease road at 33.353841, -92.692327.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: 100-0314

Orientation: 171° S

Date of Photo: 11/08/2024

Time of Photo: 1033

Latitude: 33.353867

Longitude: -92.692600

Photographer: Kerri McCabe

Description: Looking S, this photo shows the Wilson #5 production well located at the facility; residual oil staining noted during the inspection.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: In Smackover (Sandyland) from Highway 7 N, then right onto Hwy 7B, right onto Gas Plant Rd, continuing left on Gas Plant Rd, and left onto an oil lease road at 33.353841, -92.692327.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: 100-0315

Orientation: 129° SE

Date of Photo: 11/08/2024

Time of Photo: 1034

Latitude: 33.353700

Longitude: -92.692450

Photographer: Kerri McCabe

Description: Looking SE, this photo shows two storage tanks outside secondary containment without "Out of Service" labeling; view from the tank battery.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: In Smackover (Sandyland) from Highway 7 N, then right onto Hwy 7B, right onto Gas Plant Rd, continuing left on Gas Plant Rd, and left onto an oil lease road at 33.353841, -92.692327.

City: Smackover

County/Parish: Union

State: Arkansas



Photo File Name: 100-0316

Orientation: 58° ENE

Date of Photo: 11/08/2024

Time of Photo: 1034

Latitude: 33.353633

Longitude: -92.692433

Photographer: Kerri McCabe

Description: Looking ENE, this photo shows two storage tanks outside secondary containment without "Out of Service" labeling; view from the road.