

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:	Pharr, Billy W (dba B Pharr Operating, LLC)	
Facility Name:	Bo Gregory #2 SWD Tank Battery	
Facility Physical Location:	In Old Union from Highway 63 N, then Armer Rd, and left onto an oil lease road at 33.253333, -92.538889.	
(city, state, zip code)	El Dorado, AR, 71730	
Mailing address:	P.O. Box 130	
(city, state, zip code)	Emerson, AR, 71740	
County/Parish:	Union County	
Facility Phone Number	870-904-5573	
Facility Contact:	Billy Pharr	Owner / Operator
	bp@hydrooil.net	
FRS Number:	N/A	
Identification/Permit Number:	ARU002254	
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 Pharr, Billy W (dba B Pharr Operating, LLC) / Bo Gregory #2 SWD Tank Battery ("facility") at 1345 on 11/08/2024 for an unannounced follow-up inspection. The facility is located from Highway 63 E, then Armer Rd, left onto an oil lease road at 33.253333, -92.538889. 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 Kerri McCabe on 10/08/2024.

FACILITY DESCRIPTION

EPA conducted a follow-up inspection on the Pharr, Billy W (dba B Pharr Operating, LLC) / Bo Gregory #2 SWD Tank Battery, which contained one (1) tank battery, four (4) storage/separation tanks for crude oil and saltwater, and two (2) Saltwater Disposal (SWD) wells.



Map 1. Aerial imagery (Google Earth dated 03/11/2024) of the Pharr, Billy W (dba B Pharr Operating, LLC) – Bo Gregory #2 SWD Tank Battery.

Section II - OBSERVATIONS

I observed the Pharr, Billy W (B Pharr Operating, LLC) / Bo Gregory #2 SWD Tank Battery signage and associated secondary containment, storage tanks, separators/treaters, and saltwater disposal (SWD) well; see Appendix 1 (Photograph Log), see 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 and No. 4.

I observed an active leak of saltwater from a valve from one of the tanks inside secondary containment, see Photo No. 5.

I observed loose crude oil and pooled saltwater inside the secondary containment, see Photo No. 6 and No. 7.

I observed residual crude oil from the overflow noted during the 10/08/2024 inspection on the outside of secondary containment, see Photo No. 8.

I observed an area of the secondary containment berm that had been repaired since the 10/08/2024 inspection, see Photo No. 9.

Section III – AREAS OF CONCERN

No closing conference was held due to no personnel with Pharr, Billy W (dba B Pharr Operating, 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 crude oil inside and outside secondary containment for the facility,
- An active leak of saltwater from a valve from one of the storage tanks, and
- Crude oil and pooled saltwater 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 – 9 photos taken 11/08/2024.

Appendix 1

Photograph Log

9 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Old Union from Highway 63 N, then Armer Rd, and left onto an oil lease road at 33.253333, - 92.538889.

City: El Dorado

County/Parish: Union

State: AR



Photo File Name: 100-0371

Orientation: SSE

Date of Photo: 11/08/2024

Time of Photo: 1401

Latitude: 33.253550

Longitude: -92.539067

Photographer: Kerri McCabe

Description: Looking SSE, this photo shows the signage at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Old Union from Highway 63 N, then Armer Rd, and left onto an oil lease road at 33.253333, -92.538889.

City: El Dorado

County/Parish: Union

State: AR



Photo File Name: 100-0372

Orientation: SE

Date of Photo: 11/08/2024

Time of Photo: 1402

Latitude: 33.253700

Longitude: -92.539200

Photographer: Kerri McCabe

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Old Union from Highway 63 N, then Armer Rd, and left onto an oil lease road at 33.253333, - 92.538889.

City: El Dorado

County/Parish: Union

State: AR



Photo File Name: 100-0373

Orientation: E

Date of Photo: 11/08/2024

Time of Photo: 1402

Latitude: 33.253550

Longitude: -92.539200

Photographer: Kerri McCabe

Description: Looking E, this photo shows loose oil inside secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Old Union from Highway 63 N, then Armer Rd, and left onto an oil lease road at 33.253333, - 92.538889.

City: El Dorado

County/Parish: Union

State: AR



Photo File Name: 100-0374

Orientation: E

Date of Photo: 11/08/2024

Time of Photo: 1402

Latitude: 33.253550

Longitude: -92.539217

Photographer: Kerri McCabe

Description: Looking E, this photo shows loose oil inside secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Old Union from Highway 63 N, then Armer Rd, and left onto an oil lease road at 33.253333, -92.538889.

City: El Dorado

County/Parish: Union

State: AR



Photo File Name: 100-0375

Orientation: ENE

Date of Photo: 11/08/2024

Time of Photo: 1403

Latitude: 33.253500

Longitude: -92.539183

Photographer: Kerri McCabe

Description: Looking ENE, this photo shows an active leak of saltwater from a valve from one of the tanks inside secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Old Union from Highway 63 N, then Armer Rd, and left onto an oil lease road at 33.253333, -92.538889.

City: El Dorado

County/Parish: Union

State: AR



Photo File Name: 100-0376

Orientation: ESE

Date of Photo: 11/08/2024

Time of Photo: 1403

Latitude: 33.253500

Longitude: -92.539183

Photographer: Kerri McCabe

Description: Looking ESE, this photo shows loose crude oil and saltwater pooled in the sump area of secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Old Union from Highway 63 N, then Armer Rd, and left onto an oil lease road at 33.253333, -92.538889.

City: El Dorado

County/Parish: Union

State: AR



Photo File Name: 100-0377

Orientation: E

Date of Photo: 11/08/2024

Time of Photo: 1403

Latitude: 33.253467

Longitude: -92.539200

Photographer: Kerri McCabe

Description: Looking E, this photo shows an additional view from Photo No. 6.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Old Union from Highway 63 N, then Armer Rd, and left onto an oil lease road at 33.253333, -92.538889.		
City: El Dorado	County/Parish: Union	State: AR



Photo File Name: 100-0378

Orientation: NE

Date of Photo: 11/08/2024

Time of Photo: 1404

Latitude: 33.253433

Longitude: -92.539033

Photographer: Kerri McCabe

Description: Looking NE, this photo shows an area of the overflow with residual crude oil staining the outside of the secondary containment berm.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Old Union from Highway 63 N, then Armer Rd, and left onto an oil lease road at 33.253333, -92.538889.

City: El Dorado

County/Parish: Union

State: AR



Photo File Name: 100-0379

Orientation: NNE

Date of Photo: 11/08/2024

Time of Photo: 1404

Latitude: 33.253433

Longitude: -92.539033

Photographer: Kerri McCabe

Description: Looking NNE, this photo shows an area of the secondary containment berm that had been repaired since the 10/08/2024 inspection.