

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	01/30/2025	
Media Program:	Water (CWA)	
Regulatory Program(s)	Water (CWA) Brine Program (Oil & Gas inspection)	
Company Name:	ArklaTx Operating Co., Inc.	
Facility Name:	Spooner, WW Lease Tank Battery	
Facility Physical Location:	In Old Union (El Dorado), Union County, Arkansas from Arkansas Highway 63 North, thence left onto Kelly Rd, and right onto an oil field lease road at 33.250127, -92.547190.	
(city, state, zip code)	El Dorado, AR 71759	
Mailing address:	706 Ouachita Road 72	
(city, state, zip code)	Smackover, AR 71762	
County/Parish:	Union County	
Facility Phone Number	870-725-3666	
Facility Contact:	Larry L. Oswald (318-995-0502)	Person Responsible for Operation
	Rick V. Bauman (870-314-0807)	Representative
	rvbauman@yahoo.com (Rick V. Bauman)	
FRS Number:	N/A	
Identification/Permit Number:	ARU002279	
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 ArklaTx Operating Co., Inc. / Spooner, WW Lease Tank Battery (“facility”) located from Arkansas Highway 63 North, thence left onto Kelly Rd, and right onto an oil field lease road at 33.250127, -92.547190 in Old Union, Union County, Arkansas; at 0900 on 01/30/2025 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 ArklaTx Operating Co., Inc. / Spooner, WW Lease Tank Battery facility, which contained one (1) tank battery, four (4) storage tanks for crude oil/saltwater storage, one (1) saltwater disposal (SWD) injection well, and one (1) production well.



Map 1. Aerial imagery (Google Earth dated 03/11/2024) of the ArklaTx Operating Co., Inc. / Spooner, WW Lease Tank Battery.

Section II - OBSERVATIONS

I observed the facility sign, secondary containment, pipes and valves, and storage tanks located at the facility; see Appendix 1 (Photographs Log), Photo No. 1 through No. 6. For additional GPS location and photo metadata, see Appendix 1.

I observed an excavated pit adjacent to the tank battery, which had a drainpipe open to the pit. The pit contained residual crude oil, and there was a flowline passing through the pit's earthen levee, see Photo No. 7 through No. 12.

I observed the SWD injection well located onsite with residual crude oil noted on the ground, see Photo No. 13 and No. 14.

I observed a nearby crude oil production well and a flowline that were adjacent to a wetland. Total Dissolved Solid (TDS) readings were obtained from the surface water in the wetland in the area adjacent to the production well, see Photo No. 15 through No. 28.

I observed a TDS reading of 1,408 mg/L in the drainage from the production well, see Photo No. 17 through No. 19.

I observed dead vegetation and oil staining in the wetland, see Photo No. 20.

I observed an elevated TDS reading of 16,993 mg/L in a pool of water in the wetland, see Photo No. 21 through No. 23.

I observed a TDS reading of 2,162 mg/L at a series of culverts under a lease road in the wetland downstream from the elevated TDS reading referenced above, see Photo No. 24 through No. 27.

I observed a flowline parallel to the lease road, see Photo No. 28.

Section III – AREAS OF CONCERN

No closing conference was held due to no personnel with ArklaTx Operating Co., Inc. being present during the inspection. Areas of concern at the time of the inspection include the following:

- Residual, loose crude oil inside the tank battery (Photo No. 5),
- An open pipe through the secondary containment berm of the tank battery (Photo No. 6),
- An excavated pit adjacent to the tank battery with residual, loose crude oil and a flowline passing through the earthen levee of the pit (Photo No. 7 through No. 12),
- Residual, loose oil around the SWD injection well onsite (Photo No. 14),
- Residual, loose oil around a nearby production well (Photo No. 15), and
- Elevated TDS readings from surface water of a wetland near the production well (Photos No. 17, No. 21, and No. 24).

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 – 28 photos taken 01/30/2025

Appendix 1

Photograph Log 28 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Located from Arkansas Highway 63 North, thence left onto Kelly Rd, and right onto an oil field lease road at 33.250127, -92.547190.

City: Old Union (El Dorado)

County/Parish: Union

State: Arkansas



Photo File Name: 100-0507

Orientation: 40° NE

Date of Photo: 01/30/2025

Time of Photo: 0917

Latitude: 33.250117

Longitude: -92.547367

Photographer: Kerri McCabe

Description: Looking NE, this photo shows the signage for the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Located from Arkansas Highway 63 North, thence left onto Kelly Rd, and right onto an oil field lease road at 33.250127, -92.547190.

City: Old Union (El Dorado)

County/Parish: Union

State: Arkansas



Photo File Name: 100-0508

Orientation: 50° NE

Date of Photo: 01/30/2025

Time of Photo: 0917

Latitude: 33.250033

Longitude: -92.547417

Photographer: Kerri McCabe

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Located from Arkansas Highway 63 North, thence left onto Kelly Rd, and right onto an oil field lease road at 33.250127, -92.547190.

City: Old Union (El Dorado)

County/Parish: Union

State: Arkansas



Photo File Name: 100-0509

Orientation: 79° E

Date of Photo: 01/30/2025

Time of Photo: 0917

Latitude: 33.250083

Longitude: -92.547433

Photographer: Kerri McCabe

Description: Looking E, this photo shows the frontside of the tank battery with transfer lines and catchment for product.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Located from Arkansas Highway 63 North, thence left onto Kelly Rd, and right onto an oil field lease road at 33.250127, -92.547190.

City: Old Union (El Dorado)

County/Parish: Union

State: Arkansas



Photo File Name: 100-0510

Orientation: 15° NNE

Date of Photo: 01/30/2025

Time of Photo: 0918

Latitude: 33.250100

Longitude: -92.547317

Photographer: Kerri McCabe

Description: Looking NNE, this photo shows the backside of the tank battery with some residual oil noted inside the tank battery.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Located from Arkansas Highway 63 North, thence left onto Kelly Rd, and right onto an oil field lease road at 33.250127, -92.547190.

City: Old Union (El Dorado)

County/Parish: Union

State: Arkansas



Photo File Name: 100-0522

Orientation: 72° ENE

Date of Photo: 01/30/2025

Time of Photo: 0922

Latitude: 33.250333

Longitude: -92.547267

Photographer: Kerri McCabe

Description: Looking ENE, this photo shows an open pipe coming through the secondary containment of the tank battery without a shutoff valve or cap.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Located from Arkansas Highway 63 North, thence left onto Kelly Rd, and right onto an oil field lease road at 33.250127, -92.547190.

City: Old Union (El Dorado)

County/Parish: Union

State: Arkansas



Photo File Name: 100-0524

Orientation: 87° E

Date of Photo: 01/30/2025

Time of Photo: 0923

Latitude: 33.250167

Longitude: -92.547433

Photographer: Kerri McCabe

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Located from Arkansas Highway 63 North, thence left onto Kelly Rd, and right onto an oil field lease road at 33.250127, -92.547190.

City: Old Union (El Dorado)

County/Parish: Union

State: Arkansas



Photo File Name: 100-0512

Orientation: 14° NNE

Date of Photo: 01/30/2025

Time of Photo: 0918

Latitude: 33.250167

Longitude: -92.547217

Photographer: Kerri McCabe

Description: Looking NNE, this photo shows a pit directly behind the drainpipe for the tank battery. Residual, loose oil staining was noted within the pit.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Located from Arkansas Highway 63 North, thence left onto Kelly Rd, and right onto an oil field lease road at 33.250127, -92.547190.

City: Old Union (El Dorado)

County/Parish: Union

State: Arkansas



Photo File Name: 100-0516

Orientation: 230° SW

Date of Photo: 01/30/2025

Time of Photo: 0920

Latitude: 33.250367

Longitude: -92.547052

Photographer: Kerri McCabe

Description: Looking SW, this photo shows an alternate view of the pit, drainpipe, and residual oil from Photo No. 7.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Located from Arkansas Highway 63 North, thence left onto Kelly Rd, and right onto an oil field lease road at 33.250127, -92.547190.

City: Old Union (El Dorado)

County/Parish: Union

State: Arkansas



Photo File Name: 100-0517

Orientation: 101° E

Date of Photo: 01/30/2025

Time of Photo: 0920

Latitude: 33.250359

Longitude: -92.547083

Photographer: Kerri McCabe

Description: Looking E, this photo shows a flowline ran through the levee of the pit from Photo No. 7.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Located from Arkansas Highway 63 North, thence left onto Kelly Rd, and right onto an oil field lease road at 33.250127, -92.547190.

City: Old Union (El Dorado)

County/Parish: Union

State: Arkansas



Photo File Name: 100-0518

Orientation: 96° E

Date of Photo: 01/30/2025

Time of Photo: 0920

Latitude: 33.250351

Longitude: -92.547083

Photographer: Kerri McCabe

Description: Looking E, this photo shows the flowline from Photo No. 9 from the inside of the pit.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: Located from Arkansas Highway 63 North, thence left onto Kelly Rd, and right onto an oil field lease road at 33.250127, -92.547190.

City: Old Union (El Dorado)

County/Parish: Union

State: Arkansas



Photo File Name: 100-0519

Orientation: 67° ENE

Date of Photo: 01/30/2025

Time of Photo: 0920

Latitude: 33.250351

Longitude: -92.547083

Photographer: Kerri McCabe

Description: Looking ENE, this photo shows the flowline from Photo No. 9 from the outside of the pit.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: Located from Arkansas Highway 63 North, thence left onto Kelly Rd, and right onto an oil field lease road at 33.250127, -92.547190.

City: Old Union (El Dorado)

County/Parish: Union

State: Arkansas



Photo File Name: 100-0520

Orientation: 27° NNE

Date of Photo: 01/30/2025

Time of Photo: 0921

Latitude: 33.250351

Longitude: -92.547200

Photographer: Kerri McCabe

Description: Looking NNE, this photo shows the open drainpipe for the tank battery directed to the pit.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: Located from Arkansas Highway 63 North, thence left onto Kelly Rd, and right onto an oil field lease road at 33.250127, -92.547190.

City: Old Union (El Dorado)

County/Parish: Union

State: Arkansas



Photo File Name: 100-0513

Orientation: 14° NNE

Date of Photo: 01/30/2025

Time of Photo: 0919

Latitude: 33.250267

Longitude: -92.547000

Photographer: Kerri McCabe

Description: Looking NNE, this photo shows the signage and an overview of the saltwater disposal (SWD) injection well adjacent to the tank battery.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: Located from Arkansas Highway 63 North, thence left onto Kelly Rd, and right onto an oil field lease road at 33.250127, -92.547190.

City: Old Union (El Dorado)

County/Parish: Union

State: Arkansas



Photo File Name: 100-0515

Orientation: 9° N

Date of Photo: 01/30/2025

Time of Photo: 0919

Latitude: 33.250332

Longitude: -92.546967

Photographer: Kerri McCabe

Description: Looking N, this photo shows residual, loose oil on the ground around the SWD injection well.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: Located from Arkansas Highway 63 North, thence left onto Kelly Rd, and right onto an oil field lease road at 33.250127, -92.547190.

City: Old Union (El Dorado)

County/Parish: Union

State: Arkansas



Photo File Name: 100-0526

Orientation: 135° SE

Date of Photo: 01/30/2025

Time of Photo: 0930

Latitude: 33.251583

Longitude: -92.546617

Photographer: Kerri McCabe

Description: Looking SE, this photo shows residual, loose oil on the ground around a nearby production well.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: Located from Arkansas Highway 63 North, thence left onto Kelly Rd, and right onto an oil field lease road at 33.250127, -92.547190.

City: Old Union (El Dorado)

County/Parish: Union

State: Arkansas



Photo File Name: 100-0528

Orientation: 173° S

Date of Photo: 01/30/2025

Time of Photo: 0932

Latitude: 33.251367

Longitude: -92.546567

Photographer: Kerri McCabe

Description: Looking S, this photo shows a flowpath through a wetland adjacent to the production well.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: Located from Arkansas Highway 63 North, thence left onto Kelly Rd, and right onto an oil field lease road at 33.250127, -92.547190.

City: Old Union (El Dorado)

County/Parish: Union

State: Arkansas



Photo File Name: 100-0529

Orientation: 354° N

Date of Photo: 01/30/2025

Time of Photo: 0932

Latitude: 33.251300

Longitude: -92.546583

Photographer: Kerri McCabe

Description: Looking N, this photo shows a Total Dissolved Solids (TDS) reading of 1,408 mg/L for the water in the drainage from the production well area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: Located from Arkansas Highway 63 North, thence left onto Kelly Rd, and right onto an oil field lease road at 33.250127, -92.547190.

City: Old Union (El Dorado)

County/Parish: Union

State: Arkansas



Photo File Name: 100-0530

Orientation: 26° NNE

Date of Photo: 01/30/2025

Time of Photo: 0932

Latitude: 33.251283

Longitude: -92.546567

Photographer: Kerri McCabe

Description: Looking NNE, this photo shows the upstream view of the drainage from Photo No. 17. Flow direction line added for clarity.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: Located from Arkansas Highway 63 North, thence left onto Kelly Rd, and right onto an oil field lease road at 33.250127, -92.547190.

City: Old Union (El Dorado)

County/Parish: Union

State: Arkansas



Photo File Name: 100-0531

Orientation: 166° SSE

Date of Photo: 01/30/2025

Time of Photo: 0932

Latitude: 33.251303

Longitude: -92.546567

Photographer: Kerri McCabe

Description: Looking SSE, this photo shows the downstream view of the drainage from Photo No. 17. Flow direction line added for clarity.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

Location: Located from Arkansas Highway 63 North, thence left onto Kelly Rd, and right onto an oil field lease road at 33.250127, -92.547190.

City: Old Union (El Dorado)

County/Parish: Union

State: Arkansas



Photo File Name: 100-0532

Orientation: 328° NNW

Date of Photo: 01/30/2025

Time of Photo: 0933

Latitude: 33.251234

Longitude: -92.546567

Photographer: Kerri McCabe

Description: Looking NNW, this photo shows dead vegetation and oil staining in the wetland.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 21

Location: Located from Arkansas Highway 63 North, thence left onto Kelly Rd, and right onto an oil field lease road at 33.250127, -92.547190.

City: Old Union (El Dorado)

County/Parish: Union

State: Arkansas



Photo File Name: 100-0533

Orientation: 352° N

Date of Photo: 01/30/2025

Time of Photo: 0937

Latitude: 33.251133

Longitude: -92.546617

Photographer: Kerri McCabe

Description: Looking N, this photo shows the TDS reading of 16,993 mg/L in a pool of water in the wetland downstream of the drainage from the production well.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 22

Location: Located from Arkansas Highway 63 North, thence left onto Kelly Rd, and right onto an oil field lease road at 33.250127, -92.547190.

City: Old Union (El Dorado)

County/Parish: Union

State: Arkansas



Photo File Name: 100-0534

Orientation: 352° N

Date of Photo: 01/30/2025

Time of Photo: 0937

Latitude: 33.251150

Longitude: -92.546617

Photographer: Kerri McCabe

Description: Looking N, this photo shows the upstream view of the pool of water in the wetland from Photo No. 21. Flow direction line added for clarity.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 23

Location: Located from Arkansas Highway 63 North, thence left onto Kelly Rd, and right onto an oil field lease road at 33.250127, -92.547190.

City: Old Union (El Dorado)

County/Parish: Union

State: Arkansas



Photo File Name: 100-0535

Orientation: 151° SSE

Date of Photo: 01/30/2025

Time of Photo: 0937

Latitude: 33.251167

Longitude: -92.546600

Photographer: Kerri McCabe

Description: Looking SSE, this photo shows the downstream view of the pool of water in the wetland from Photo No. 21. Flow direction lined added for clarity.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 24

Location: Located from Arkansas Highway 63 North, thence left onto Kelly Rd, and right onto an oil field lease road at 33.250127, -92.547190.

City: Old Union (El Dorado)

County/Parish: Union

State: Arkansas



Photo File Name: 100-0536

Orientation: 82° E

Date of Photo: 01/30/2025

Time of Photo: 0939

Latitude: 33.251033

Longitude: -92.546567

Photographer: Kerri McCabe

Description: Looking E, this photo shows the TDS reading of 2,162 mg/L at a series of culverts under the lease road in the wetland downstream of the pool of water in Photo No. 22.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 25

Location: Located from Arkansas Highway 63 North, thence left onto Kelly Rd, and right onto an oil field lease road at 33.250127, -92.547190.

City: Old Union (El Dorado)

County/Parish: Union

State: Arkansas

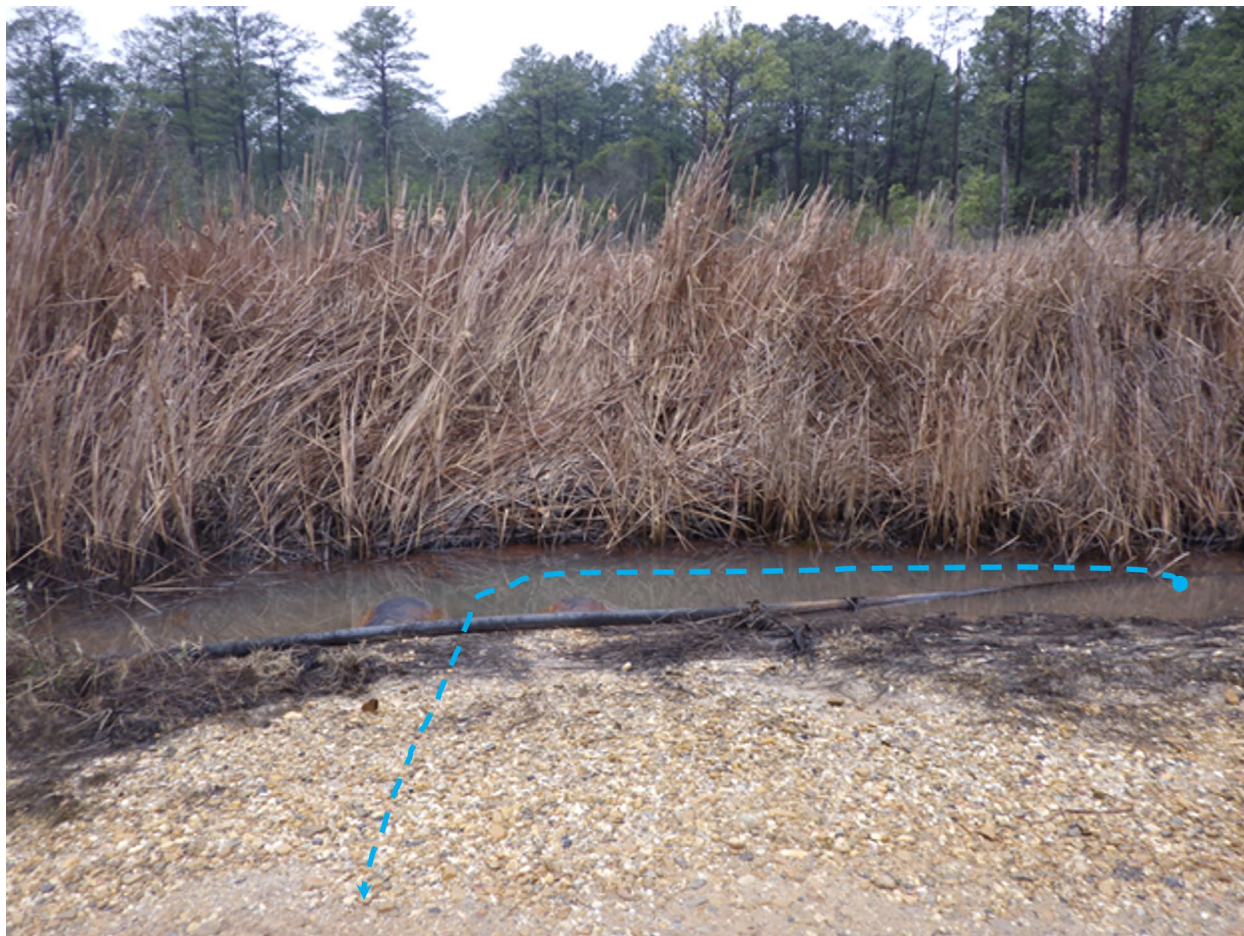


Photo File Name: 100-0537

Orientation: 331° NNW

Date of Photo: 01/30/2025

Time of Photo: 0939

Latitude: 33.251033

Longitude: -92.546567

Photographer: Kerri McCabe

Description: Looking NNW, this photo shows the upstream view of the culvert area in the wetland from Photo No. 24. Flow direction line added for clarity.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 26

Location: Located from Arkansas Highway 63 North, thence left onto Kelly Rd, and right onto an oil field lease road at 33.250127, -92.547190.

City: Old Union (El Dorado)

County/Parish: Union

State: Arkansas



Photo File Name: 100-0538

Orientation: 97° E

Date of Photo: 01/30/2025

Time of Photo: 0939

Latitude: 33.251050

Longitude: -92.546567

Photographer: Kerri McCabe

Description: Looking E, this photo shows the downstream view of the culvert area in the wetland from Photo No. 24. Flow direction line added for clarity.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 27

Location: Located from Arkansas Highway 63 North, thence left onto Kelly Rd, and right onto an oil field lease road at 33.250127, -92.547190.

City: Old Union (El Dorado)

County/Parish: Union

State: Arkansas



Photo File Name: 100-0539

Orientation: 46° NE

Date of Photo: 01/30/2025

Time of Photo: 0939

Latitude: 33.251001

Longitude: -92.546615

Photographer: Kerri McCabe

Description: Looking NE, this photo shows an additional view of the wetland connected by culverts under the lease road. Flow direction line added for clarity.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 28

Location: Located from Arkansas Highway 63 North, thence left onto Kelly Rd, and right onto an oil field lease road at 33.250127, -92.547190.

City: Old Union (El Dorado)

County/Parish: Union

State: Arkansas



Photo File Name: 100-0541

Orientation: 20° NNE

Date of Photo: 01/30/2025

Time of Photo: 0940

Latitude: 33.251150

Longitude: -92.546600

Photographer: Kerri McCabe

Description: Looking NNE, this photo shows an anchor used to keep the flowline in place during high-flow events. Flowline is parallel with the lease road.