

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	4/3/24	
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
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 Rebel Producing, LLC / Exxon Lease Tank Battery, located from Highway 82 East, thence New London Rd, off Winchester Rd at 33.180500, - 92.314600; at 1112 on 4/3/24 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 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.

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 through No. 3. For additional GPS location and photo metadata, see Appendix 1.

I observed a transfer pipe over secondary containment without a catch bucket and loose oil on the ground, see Photo No. 4.

I observed an active leak of crude oil and loose oil inside secondary containment, see Photo No. 5 through No. 7.

I observed woody vegetation growing in the firewall berm (secondary containment), see Photo No. 8.

I observed an active leak of saltwater from one of the storage tanks inside secondary containment, see Photo No. 9.

I observed the drainpipe for secondary containment with an open valve and no cap on the pipe; salt crystals were observed on the ground around the drainpipe; see Photo No. 10 and No. 11.

Section III – AREAS OF CONCERN

No closing conference was held due to no personnel with Rebel Producing, LLC being present during the inspection. Areas of concern at the time of the inspection include the transfer pipe with no catch bucket and loose oil on the ground, an active leak of crude oil from piping inside secondary containment, vegetation growing in the firewall berm, an active leak of saltwater from a storage tank inside secondary

containment, and the drainpipe for secondary containment with an open valve and no cap with salt crystals noted on the ground around the drainpipe.

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 4/3/24.

Appendix 1

Photograph Log

11 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Rebel Producing, LLC – Exxon Lease Tank Battery off Winchester Rd at 33.180500, -92.314600.		
City: Strong	County/Parish: Union	State: Arkansas



Photo File Name: P4020075

Orientation: ESE

Date of Photo: 04/03/2024

Time of Photo: 1142

Latitude: 33.180335

Longitude: -92.314478

Photographer: Kerri McCabe

Description: Looking ESE, this photo showed the signage at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Rebel Producing, LLC – Exxon Lease Tank Battery off Winchester Rd at 33.180500, -92.314600.		
City: Strong	County/Parish: Union	State: Arkansas



Photo File Name: P4020076

Orientation: SE

Date of Photo: 04/03/2024

Time of Photo: 1143

Latitude: 33.180335

Longitude: -92.314478

Photographer: Kerri McCabe

Description: Looking SE, this photo showed additional signage at the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Rebel Producing, LLC – Exxon Lease Tank Battery off Winchester Rd at 33.180500, -92.314600.		
City: Strong	County/Parish: Union	State: Arkansas



Photo File Name: P4020077

Orientation: ESE

Date of Photo: 04/03/2024

Time of Photo: 1143

Latitude: 33.180180

Longitude: -92.314415

Photographer: Kerri McCabe

Description: Looking ESE, this photo showed an overview of the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Rebel Producing, LLC – Exxon Lease Tank Battery off Winchester Rd at 33.180500, -92.314600.		
City: Strong	County/Parish: Union	State: Arkansas



Photo File Name: P4020078

Orientation: ENE

Date of Photo: 04/03/2024

Time of Photo: 1144

Latitude: 33.180266

Longitude: -92.314481

Photographer: Kerri McCabe

Description: Looking ENE, this photo showed a transfer pipe over secondary containment with no catch bucket and loose oil on the ground.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Rebel Producing, LLC – Exxon Lease Tank Battery off Winchester Rd at 33.180500, -92.314600.		
City: Strong	County/Parish: Union	State: Arkansas



Photo File Name: P4020079

Orientation: SE

Date of Photo: 04/03/2024

Time of Photo: 1144

Latitude: 33.180339

Longitude: -92.314563

Photographer: Kerri McCabe

Description: Looking SE, this photo showed loose oil around conduits for the storage tanks inside secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Rebel Producing, LLC – Exxon Lease Tank Battery off Winchester Rd at 33.180500, -92.314600.		
City: Strong	County/Parish: Union	State: Arkansas



Photo File Name: P4020083

Orientation: NW

Date of Photo: 04/03/2024

Time of Photo: 1147

Latitude: 33.180339

Longitude: -92.314563

Photographer: Kerri McCabe

Description: Looking NW, this photo showed an additional view of the loose oil around conduits for the storage tanks from Photo No. 5.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Rebel Producing, LLC – Exxon Lease Tank Battery off Winchester Rd at 33.180500, -92.314600.		
City: Strong	County/Parish: Union	State: Arkansas



Photo File Name: P4020084

Orientation: SSW

Date of Photo: 04/03/2024

Time of Photo: 1147

Latitude: 33.180339

Longitude: -92.314563

Photographer: Kerri McCabe

Description: Looking SSW, this photo showed a closeup of the loose oil around conduits for the storage tanks from Photo No. 5.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Rebel Producing, LLC – Exxon Lease Tank Battery off Winchester Rd at 33.180500, -92.314600.		
City: Strong	County/Parish: Union	State: Arkansas



Photo File Name: P4020080

Orientation: E

Date of Photo: 04/03/2024

Time of Photo: 1144

Latitude: 33.180464

Longitude: -92.314512

Photographer: Kerri McCabe

Description: Looking E, this photo showed woody vegetation growing in the firewall (secondary containment).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Rebel Producing, LLC – Exxon Lease Tank Battery off Winchester Rd at 33.180500, -92.314600.		
City: Strong	County/Parish: Union	State: Arkansas



Photo File Name: P4020081

Orientation: N

Date of Photo: 04/03/2024

Time of Photo: 1146

Latitude: 33.180394

Longitude: -92.314598

Photographer: Kerri McCabe

Description: Looking N, this photo showed an active leak from one of the storage tanks inside secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Rebel Producing, LLC – Exxon Lease Tank Battery off Winchester Rd at 33.180500, -92.314600.		
City: Strong	County/Parish: Union	State: Arkansas



Photo File Name: P4020085

Orientation: ENE

Date of Photo: 04/03/2024

Time of Photo: 1149

Latitude: 33.180135

Longitude: -92.314650

Photographer: Kerri McCabe

Description: Looking ENE, this photo showed the drainpipe for secondary containment with an open valve and no cap on the pipe.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: Rebel Producing, LLC – Exxon Lease Tank Battery off Winchester Rd at 33.180500, -92.314600.		
City: Strong	County/Parish: Union	State: Arkansas



Photo File Name: P4020087

Orientation: SW

Date of Photo: 04/03/2024

Time of Photo: 1149

Latitude: 33.180135

Longitude: -92.314650

Photographer: Kerri McCabe

Description: Looking SW, this photo showed salt crystals in the sand in the area that the drainpipe discharges.