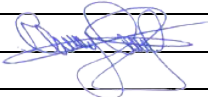


**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	06/19/2015		
Media:	CWA (Water)		
Regulatory Program(s)	NPDES – Oil and Gas BRINE		
Company Name:	East Texas Salt Water Disposal Company (Respondent)		
Facility Name:	Hopkins Center, RRC # P001154		
Facility Physical Location:	111 Mitzi Street Longview, Texas 75604 0.1 mi NE (N32°32'24.22" and W94°50'32.77")		
(city, state, zip code)	Novice, Gregg Co., Texas 79538		
Mailing address:	1209 Industrial BLVD, Kilgore Texas 75662		
(city, state, zip code)	Kilgore Texas 75662		
County/Parish:	Gregg County		
Facility Contact:	Mr. Patrick J Nault	President	
	HWood@etswd.com		
FRS Number:	N/A		
Identification/Permit Number:	TXU011042		
Media Number:	N/A		
NAICS:	1311		
SIC:	211111		
Personnel participating in inspection:			
Jack Arias	6EN-WR	Environmental Scientist	214-665-8164
Matthew Rudolph	6EN-WR	Environmental Scientist	214-665-6434
EPA Lead Inspector			8-19-15
Signature/Date	Jack A Arias		Date
	Willie Lane, Jr.		Date

Section I - INTRODUCTION

PURPOSE OF THE INSPECTION

The purpose of the inspection was to determine if the facility was in compliance with Section 301 of the Clean Water Act (CWA) and to identify and document discharges of produced wastewater (brine) to waters of the United States. The Inspection was conducted under the authority of Section 308 of the CWA. EPA Region 6 inspectors, Jack Arias and Matthew Rudolph, arrived at the facility at approximately 9:16 am on June 19, 2015 for an unannounced inspection. We tried to find the operator of the facility; however, we could not find any operator at the facility. We needed to evaluate the facility's tanks, flow lines, flow paths, ponds, tributaries, creeks, and other factors connected to the CWA. As the need was neither posted nor technical, we conducted an oil and Gas-Brine Clean Water Act (CWA) inspection.

FACILITY DESCRIPTION

The facility is known as the East Texas Salt Water Disposal Company and is located in Kilgore, Gregg County, Texas approximately 20 feet from the tributary of Hawkins Creek (Photo 1). The facility's disposal lease is located at latitude: N 32°32'24.22" and Longitude: W 94°50'32.77" (photo 2). The lease consists of an injection well, vessels, flow lines, collection points, and other equipment used for the disposal of produced water (brine) the byproduct of production of crude oil and natural gas. Production wells produce a mixture of produced water and crude oil (well fluids). Flow lines are used to transport well fluids to various locations on the leases. Collection points known as tank batteries consist of various tanks, vessels, and equipment used to separate and store the produced water (brine) and crude oil. Produced water is typically high in salts and is commonly known as oil field brine. The crude oil is sold for profit and the produced water and/or brine is transported to and disposed of in various injection wells.

Section II - OBSERVATIONS

When we arrived at this facility on June 19, 2015, we noticed that the Hopkins lease (pit) had discharged produced wastewater (pollutants) to the tributary of Hawkins Creek (photo 4). We walked around the pit and observed well fluids seeping through the walls of the pit (photo 4), a PVC flow line on the ground with an unidentified destination, flow paths of fluids, and a pool of produced water (brine) (photos 4, 5, 6). Calibrated YSI 30 Salinity Conductivity Meter was used to measure the Total Soluble Salt (TSS) in the near tributary. At the pool of fluids, we measured the Total Soluble Salt (TSS) and obtained a reading of 6,800 ppm TSS (photo 7). Also we observed that the flow path of fluids was going into the tributary of Hawkins Creek (photo 8). We followed the flow path downstream into the tributary of Hawkins Creek and obtained a reading of 4,400 ppm TSS (photo 9). Flow path reached the tributary of Hawkins Creek at latitude 32°32'22.42"N, and longitude - 94°50'32.20"W (photo 9). We walked upstream of the Hopkins Lease and at latitude 32°32'23.83"N and longitude - 94°50'33.00"W (photos 10 & 11) we observed disturbed soil, salt stains, soil saturated with well fluids, and flow paths of fluids going into the tributary of Hawkins Creek (photos 10 & 11). **We recorded background water quality data** (water quality in the area) approximately 197 feet upstream of the point of entry and at latitude 32°32'24.22"N and Longitude -94°50'32.77"W. We obtained a reading of 200 ppm TSS (photos 12 & 13).

Section III – AREAS OF CONCERN

PVC flow line, open pipe with potential to discharge fluids into the tributary, containment walls around the tanks are improperly constructed, and high concentrations of TSS in the tributary of **Hawkins Creek** are concerns at this facility.

Section IV – FOLLOW UP

- Send a copy of the inspection report to the facility. Continue coordination with RRC and any other organization that might become involved with actions at this facility about the Areas of Concern.
- Continue working with the facility to enable it to come into compliance with the requirements of the CWA
- Conference call with the facility to discuss inspection report
- Discuss inspection report with management to determine compliance and follow up

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 13 Photos taken 6/19/15

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: East Texas Salt Water Disposal Company		
City: Kilgore	County/Parish: Gregg	State: Texas



Photo File Name: Facility Map

Date of Photo: NA

Latitude: 31°59'55.34"N

Longitude: - 99°38'25.72"W

Time of Photo: NA

Author: Jack Arias

Description: Layout of East Texas Salt Water Disposal Company "Hopkins Lease". It is located next to tributary of Hawkins Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: East Texas Salt Water Disposal Company		
City: Kilgore	County/Parish: Gregg	State: Texas



Photo File Name: Facility Map

Date of Photo: NA

Latitude: 31°59'55.34"N

Longitude: -99°38'25.72"W

Time of Photo: NA

Author: Jack Arias

Description: Layout of East Texas Salt Water Disposal Company. Blue color indicated background water quality data, red color indicated point source of contamination, orange indicated Total Soluble Salts (TSS), and yellow color indicated salt stains and flow path.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: East Texas Salt Water Disposal Company		
City: Kilgore	County/Parish: Gregg	State: Texas



Photo File Name: DSCN0125.JPG

Date of Photo: 6/19/2015

Time of Photo: 9:16 am

Latitude: N 32°32'22.82"

Longitude: W 94°50'33.92"

Orientation: Facing Southeast

Map Datum: WGS-84

Photographer: Jack Arias

Description: East Texas Salt Water Disposal Company showing the information of the lease. It is located 149 feet from tributary of Hawkins Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: East Texas Salt Water Disposal Company		
City: Kilgore	County/Parish: Gregg	State: Texas



Photo File Name: DSCN0128.JPG

Date of Photo: 6/19/2015

Time of Photo: 9:20 am

Latitude: N 32°32'22.45"

Longitude: W 94°50'32.69"

Orientation: Facing Northwest

Map Datum: WGS-84

Photographer: Jack Arias

Description: An overview of fluids seeping through the walls of the pit and going into the tributary of Hawkins Creek. We observed a PVC flow line on the ground with an unidentified destination, containment improperly constructed, flow paths of fluids, and a pool of produced water (brine).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: East Texas Salt Water Disposal Company		
City: Kilgore	County/Parish: Gregg	State: Texas



Photo File Name: DSCN0129.JPG

Date of Photo: 6/19/2015

Time of Photo: 9:21 am

Latitude: N 32°32'22.45"

Longitude: W 94°50'32.69"

Orientation: Facing Northwest

Map Datum: WGS-84

Photographer: Jack Arias

Description: An overview of fluids seeping through the walls of the pit (photo), a PVC flow line on the ground with an unidentified destination (photo), flow paths of fluids, and a pool of produced water (brine).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: East Texas Salt Water Disposal Company		
City: Kilgore	County/Parish: Gregg	State: Texas



Photo File Name: DSCN0127.JPG

Date of Photo: 6/19/2015

Time of Photo: 9:20 am

Latitude: N 32°32'22.41"

Longitude: W 94°50'32.54"

Orientation: Facing Northwest

Map Datum: WGS-84

Photographer: Jack Arias

Description: An overview of pool and flow path of fluids going into the tributary of Hawkins Creek. We observed a PVC flow line on the ground with an unidentified destination, containment improperly constructed, flow paths of fluids, and a pool of produced water (brine).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: East Texas Salt Water Disposal Company		
City: Kilgore	County/Parish: Gregg	State: Texas



Photo File Name: DSCN0126.JPG

Date of Photo: 6/19/2015

Time of Photo: 9:19 am

Latitude: N 32°32'22.41"

Longitude: W 94°50'32.54"

Orientation: Facing Northwest

Map Datum: WGS-84

Photographer: Jack Arias

Description: Overview of the YSI Salinity Conductivity Meter. We measured the Total Soluble Salts (TSS) and obtained a reading of 6,800 ppm TSS. This point is located 29 feet from the tributary of Hawkins Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: East Texas Salt Water Disposal Company		
City: Kilgore	County/Parish: Gregg	State: Texas



Photo File Name: DSCN0131.JPG

Date of Photo: 6/19/2015

Time of Photo: 9:28 am

Latitude: N 32°32'22.41"

Longitude: W 94°50'32.54"

Orientation: Facing Northwest

Map Datum: WGS-84

Photographer: Jack Arias

Description: Overview of fluids going into the tributary of Hawkins Creek. We measured the Total Soluble Salts (TSS) and obtained a reading of 4,400 ppm TSS.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: East Texas Salt Water Disposal Company		
City: Kilgore	County/Parish: Gregg	State: Texas



Photo File Name: DSCN0130.JPG

Date of Photo: 6/19/2015

Time of Photo: 9:24 am

Latitude: N 32°32'22.42"

Longitude: W 94°50'32.20"

Orientation: Facing Northwest

Map Datum: WGS-84

Photographer: Jack Arias

Description: Overview of YSI Salinity Conductivity Meter. We observed fluids going into the tributary of Hawkins Creek. We measured the Total Soluble Salts (TSS) and obtained a reading of 4,400 ppm TSS.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: East Texas Salt Water Disposal Company		
City: Kilgore	County/Parish: Gregg	State: Texas



Photo File Name: DSCN0136.JPG

Date of Photo: 6/19/2015

Time of Photo: 10:48 am

Latitude: N 32°32'23.83"

Longitude: W 94°50'33.00"

Orientation: Facing Northwest

Map Datum: WGS-84

Photographer: Jack Arias

Description: Overview of flow path of fluids going into the tributary of Hawkins Creek. We observed a flow path of dead vegetation, disturbed soil, salt stains, and soil saturated with fluids. The flow path is located approximately 24 feet from tributary of Hawkins Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: East Texas Salt Water Disposal Company		
City: Kilgore	County/Parish: Gregg	State: Texas



Photo File Name: DSCN0135.JPG

Date of Photo: 6/19/2015

Time of Photo: 9:37 am

Latitude: N 32°32'23.62"

Longitude: W 94°50'32.66"

Orientation: Facing Northwest

Map Datum: WGS-84

Photographer: Jack Arias

Description: Overview of flow path of fluids going into the tributary of Hawkins Creek. We observed dead vegetation, disturbed soil, salt stains, soil saturated with fluids, and produced water (brine). The flow path is located approximately 13 feet from tributary of Hawkins Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: East Texas Salt Water Disposal Company		
City: Kilgore	County/Parish: Gregg	State: Texas



Photo File Name: DSCN0133.JPG

Date of Photo: 6/19/2015

Time of Photo: 9:34 am

Latitude: N 32°32'24.22"

Longitude: W 94°50'32.77"

Orientation: Facing Northwest

Map Datum: WGS-84

Photographer: Jack Arias

Description: Background water quality data (water quality in the area) information. We measured the Total Soluble Salts (TSS) 197 feet upstream of point of entry (POE) in Hawkins Creek and obtained a reading of 200 ppm TSS.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: East Texas Salt Water Disposal Company		
City: Kilgore	County/Parish: Gregg	State: Texas



Photo File Name: DSCN0132.JPG

Date of Photo: 6/19/2015

Time of Photo: 9:33 am

Latitude: N 32°32'24.22"

Longitude: W 94°50'32.77"

Orientation: Facing Northwest

Map Datum: WGS-84

Photographer: Jack Arias

Description: Overview of the YSI Salinity Conductivity Meter. We recorded background water quality data (water quality in the area) information. We measured the Total Soluble Salts (TSS) 197 feet upstream of point of entry (POE) in Hawkins Creek and obtained a reading of 200 ppm TSS.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: East Texas Salt Water Disposal Company		
City: Kilgore	County/Parish: Gregg	State: Texas