

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	03/04/2025	
Media Program:	Water, Clean Water Act (Brine)	
Regulatory Program(s)	Brine (NPDES)	
Company Name:	Northcote Cleveland LLC	
Facility Name:	Osage C Lease	
Facility Physical Location:	Latitude: 36.263975, Longitude: -96.220317	
(city, state, zip code)	Prue, Oklahoma, 74060	
Mailing address:	701 S Eighth St	
(city, state, zip code)	Ponca City, Oklahoma, 74601	
County/Parish:	Osage County	
Facility Phone Number	1-580-716-1784	1-405-693-4956
Facility Contact:	Joey Mather	Owner/Operator
	joey.mather@primalkitchen.com	
FRS Number:	n/a	
Identification/Permit Number:	OKU002213	
Media Identifier Number:	n/a	
NAICS:	211111	
SIC:	1311	
Personnel participating in inspection:		
Matthew Allen	EPA, Region 6ECDW	Inspector
Mike Perrier	BIA Osage Agency	Inspector
EPA Lead Inspector Signature/Date		
	Matthew Allen	Date
Supervisor Signature/Date		
	Jeanne Eckhart	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector Matthew Allen arrived at the Northcote Cleveland, LLC, Osage B Lease (EPA ID No. OKU002213), at 12:00 PM on 03/4/2025 for an announced inspection. This was a spill inspection in response to a spill report received by EPA Region 6 (NRC# 1425010). The inspection was conducted by the authority of the Clean Water Act to determine compliance with Environmental Protection Agency (EPA) regulations. Bureau of Indian Affairs (BIA) Osage Agency inspector, Mike Perrier, participated during the inspection. There were no other federal, tribal, state, or local agency representatives present at the time of the inspection.

FACILITY DESCRIPTION

EPA conducted a spill inspection on the Northcote Cleveland, LLC, Osage C Lease which included the Osage C lease tank battery and connected wells and flowlines. The spill originated from a production flowline inside the tank battery which transported produced water (oil and saltwater) from the producing wells to the oil separation/storage facility (tank battery). The Osage C Lease was located north of New Prue Road, in Osage County, Oklahoma.

Section II - OBSERVATIONS

I observed the facility signage for the Northcote Cleveland, LLC, Osage B Lease tank battery. See photo No. 1 of Appendix 1 (photo log). For additional GPS location and photo metadata, see Appendix 1.

I observed the Osage B tank battery from the NE corner of the facility. This overview can be seen in photo No. 2.

Inside the secondary containment of the facility, I observed the release point of the spill, which was a leaking hammer union on a production flowline running across the floor of the facility. At the time of the inspection, produced water and oil was actively leaking from the flowline. This observation can be seen in photo No. 3.

I observed the pit area to the south of the facilities' storage and process vessels. The pit area was filled with produced water and had free oil floating atop the water at the time of the inspection. See photo No. 4.

I observed an eroded section of the inadequate secondary containment along the south side of the facility. At the time of the inspection, produced water was discharging from the secondary containment as seen in photo No. 5

I observed a TDS field reading of 22,560 mg/L in the water which was discharging from the secondary containment. This was the highest TDS field reading observed during the inspection. This observation along with all others during the inspection was made with a properly calibrated YSI Pro 30 conductivity meter. The water was discharging to the SE along a natural drainage feature. See photo No. 6.

Standing at the eroded section of secondary containment I observed the pit area and release point of the spill with a view toward the NW. See photo No. 7.

Approximately ¼ mile downstream from the Osage B tank battery, I observed a TDS field reading of 917 mg/L at an area where the drainage feature had mixed into an unnamed tributary of Mud Creek. See photo No. 8.

Section III – AREAS OF CONCERN

The primary area of concern at the time of the inspection was the fact that the release was ongoing and not secured. The lease owner/operator was also unresponsive to BIA field inspector Mike Perrier, in his attempts to contact the owner/operator.

Additional areas of concern included the elevated TDS waters which were being released with the potential to impact waters of the United States (WOTUS) if the release is not secured. This area of concern was elevated due to the owner/operator being unresponsive/unreachable. Crude oil also had the potential to impact WOTUS.

The improperly constructed and insufficient secondary containment at the facility was also an area of concern.

Section IV – FOLLOW UP

EPA inspector has referred the facility to the EPA-SPCC/FRP program for further evaluation.

After the inspection concluded, BIA field supervisor, Jeff McGuire was able to contact the facility owner and request the release be secured before further downstream migration of spill impacts.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 8 photos taken 3/4/2025

Appendix 1

Photograph Log 8 Photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: 36.263975, -96.220317		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010574

Orientation: NA

Date of Photo: 3/4/2025

Time of Photo: 1:27 PM

Latitude: 36.263975

Longitude: -96.220317

Photographer: Matthew Allen

Description: This was the facility signage for the Northcote Cleveland, LLC, Osage C tank battery.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: 36.263975, -96.220317		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010575

Orientation: WSW

Date of Photo: 03/4/2025

Time of Photo: 1:27 PM

Latitude: 36.263975

Longitude: -96.220317

Photographer: Matthew Allen

Description: This was an overview of the Osage C Lease tank batter with a view toward the WSW.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: 36.263975, -96.220317		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010576

Orientation: NA

Date of Photo: 03/4/2025

Time of Photo: 1:28 PM

Latitude: 36.263975

Longitude: -96.220317

Photographer: Matthew Allen

Description: This was the release point of the spill, a leaking hammer union on a flowline, located inside the secondary containment. At the time of the inspection, the leak was ongoing, releasing saltwater and oil to the floor of the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: 36.263975, -96.220317		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010577

Orientation: SE

Date of Photo: 03/4/2025

Time of Photo: 1:28 PM

Latitude: 36.263975

Longitude: -96.220317

Photographer: Matthew Allen

Description: This was a view of the pit area inside the secondary containment. There was oil and saltwater covering the area, and the pit was actively discharging through the insufficient berm at the time of the inspection.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: 36.263975, -96.220317		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010578

Orientation: NA

Date of Photo: 03/4/2025

Time of Photo: 1:29 PM

Latitude: 36.263975

Longitude: -96.220317

Photographer: Matthew Allen

Description: This was the area of eroded secondary containment where the spill was actively discharging out of the facility at the time of the inspection. The TDS of the discharge was observed to be 22,560 mg/L.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: 36.263975, -96.220317		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010579

Orientation: NA

Date of Photo: 03/4/2025

Time of Photo: 1:31 PM

Latitude: 36.263975

Longitude: -96.220317

Photographer: Matthew Allen

Description: This was a TDS field reading of 22,560 mg/L taken from the water which was discharging from the eroded secondary containment at the facility. The discharge was migrating SW along a drainage feature.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: 36.263975, -96.220317		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010580

Orientation: NA

Date of Photo: 03/4/2025

Time of Photo: 1:32 PM

Latitude: 36.263975

Longitude: -96.220317

Photographer: Matthew Allen

Description: This was a view standing at the eroded secondary containment looking NW across the pit toward the release point of the spill.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: 36.263975, -96.220317		
City: Prue	County/Parish: Osage	State: Oklahoma



Photo File Name: R0010573

Orientation: NA

Date of Photo: 03/4/2025

Time of Photo: 1:09 PM

Latitude: 36.261842

Longitude: -96.223503

Photographer: Matthew Allen

Description: This was a TDS field reading of 917 mg/L observed approximately ¼ mile downstream from the release point where the drainage feature had spilled into an unnamed tributary of Mud Creek.