

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:	El Dorado Operating, LLC	
Facility Name:	Gregory Lease Tank Battery	
Facility Physical Location:	In Old Union from Highway 63 N, then Armer Rd, and left onto an oil lease road at 33.250258, -92.537361.	
(city, state, zip code)	El Dorado, AR, 71730	
Mailing address:	920 N Jefferson	
(city, state, zip code)	El Dorado, AR 71730	
County/Parish:	Union County	
Facility Phone Number	870-725-3042 (Jerry Langley)	
Facility Contact:	Jim Phillips jimphillips@arprodserv.com	Representative
FRS Number:	N/A	
Identification/Permit Number:	ARU002281	
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

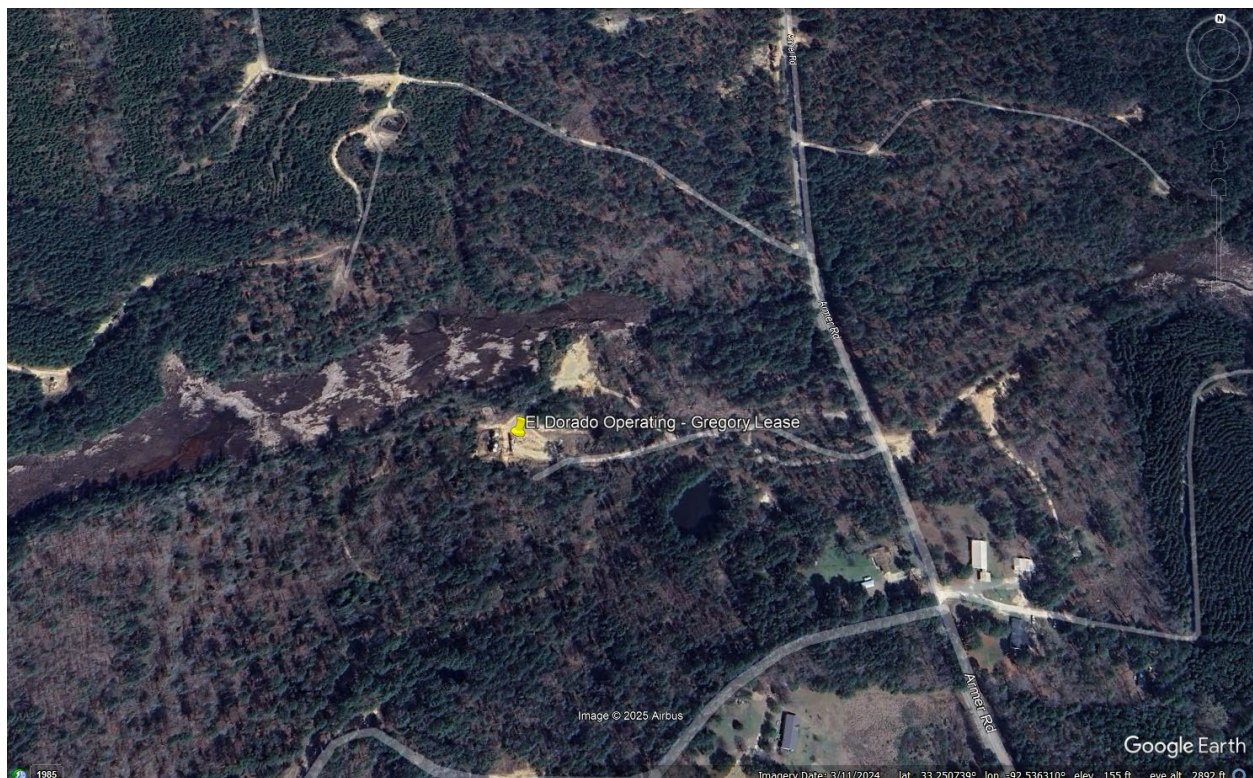
Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Kerri McCabe (lead) and Michael Blaha arrived at the El Dorado Operating, LLC / Gregory Lease Tank Battery ("facility"), located from Highway 63 E, then Armer Rd, left onto an oil lease road at 33.250258, -92.537361; at 1100 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 El Dorado Operating, LLC / Gregory Lease Tank Battery, which contained five (5) storage/separation tanks for crude oil and saltwater, two (2) saltwater disposal (SWD) injection wells, and an additional tank battery that appeared to be out of service.



Map 1. Aerial imagery (Google Earth dated 03/11/2024) of the El Dorado Operating, LLC / Gregory Lease Tank Battery.

Section II – OBSERVATIONS

I observed the El Dorado Operating, LLC / Gregory Lease Tank Battery facility and associated signage, secondary containment, storage tanks, and treaters/separators; see Appendix 1 (Photographs Log), see Photos No. 1 and No. 2. For additional GPS location and photo metadata, see Appendix 1.

I observed the inside of the secondary containment with residual crude oil, salt crystal formation, and dirt work for drainage and berm maintenance, see Photos No. 3 through No. 6.

I observed two transfer lines without catchment buckets outside secondary containment, see Photos No. 7 and No. 8.

I observed the sump area and drainpipe for the secondary containment, see Photos No. 9 and No. 10.

I observed an additional tank battery located near the facility that appeared to be out of service, see Photo No. 11.

I observed two (2) SWD injection wells both with workover pits that contained residual crude oil and saltwater, see Photos No. 12 through No. 16.

Section III – AREAS OF CONCERN

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

- Residual crude oil and salt crystal formation inside secondary containment (Photos No. 3 through No. 6 and No. 9),
- Transfer lines without catchment buckets outside secondary containment (Photos No. 7 and No. 8),
- An additional tank battery that appeared to be out of service (Photo No. 11), and
- Two (2) workover pits that contained residual crude oil and saltwater (Photos No. 13, No. 14, and No. 16).

Section IV – FOLLOW UP

Inspector will conduct follow-up phone calls and emails 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 – 16 photos taken 01/30/2025.

Appendix 1

Photograph Log 16 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 33.250258, -92.537361.

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: 100-0586

Orientation: 272° W

Date of Photo: 01/30/2025

Time of Photo: 1122

Latitude: 33.250300

Longitude: -92.537517

Photographer: Kerri McCabe

Description: Looking W, 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 33.250258, -92.537361.

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: 100-0587

Orientation: 176° S

Date of Photo: 01/30/2025

Time of Photo: 1123

Latitude: 33.250400

Longitude: -92.537400

Photographer: Kerri McCabe

Description: Looking S, 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 33.250258, -92.537361.

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: 100-0588

Orientation: 276° W

Date of Photo: 01/30/2025

Time of Photo: 1123

Latitude: 33.250350

Longitude: -92.537483

Photographer: Kerri McCabe

Description: Looking W, this photo shows loose oil inside the 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 33.250258, -92.537361.

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: 100-0589

Orientation: 138° SE

Date of Photo: 01/30/2025

Time of Photo: 1124

Latitude: 33.250350

Longitude: -92.537583

Photographer: Kerri McCabe

Description: Looking SE, this photo shows an overview of the storage tanks and treaters/separators 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 33.250258, -92.537361.

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: 100-0591

Orientation: 100° E

Date of Photo: 01/30/2025

Time of Photo: 1124

Latitude: 33.250250

Longitude: -92.537683

Photographer: Kerri McCabe

Description: Looking E, this photo shows some dirt work for drainage and berms 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 33.250258, -92.537361.

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: 100-0593

Orientation: 21° NNE

Date of Photo: 01/30/2025

Time of Photo: 1125

Latitude: 33.250100

Longitude: -92.537450

Photographer: Kerri McCabe

Description: Looking NNE, this photo shows residual crude oil and salt crystal formation inside 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 33.250258, -92.537361.

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: 100-0595

Orientation: 312° NW

Date of Photo: 01/30/2025

Time of Photo: 1125

Latitude: 33.250183

Longitude: -92.537317

Photographer: Kerri McCabe

Description: Looking NW, this photo shows a transfer line without a catchment bucket.



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 33.250258, -92.537361.

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: 100-0596

Orientation: 335° NNW

Date of Photo: 01/30/2025

Time of Photo: 1125

Latitude: 33.250283

Longitude: -92.537400

Photographer: Kerri McCabe

Description: Looking NNW, this photo shows a transfer line without a catchment bucket.



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 33.250258, -92.537361.

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: 100-0597

Orientation: 307° NW

Date of Photo: 01/30/2025

Time of Photo: 1127

Latitude: 33.250167

Longitude: -92.537417

Photographer: Kerri McCabe

Description: Looking NW, this photo shows sump area of the secondary containment with loose crude oil and salt crystal formation.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Old Union from Highway 63 N, then Armer Rd, and left onto an oil lease road at 33.250258, -92.537361.

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: 100-0598

Orientation: 351° N

Date of Photo: 01/30/2025

Time of Photo: 1127

Latitude: 33.250167

Longitude: -92.537403

Photographer: Kerri McCabe

Description: Looking N, this photo shows the drainpipe for the secondary containment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: Old Union from Highway 63 N, then Armer Rd, and left onto an oil lease road at 33.250258, -92.537361.

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: 100-0599

Orientation: 147° SSE

Date of Photo: 01/30/2025

Time of Photo: 1127

Latitude: 33.250150

Longitude: -92.537267

Photographer: Kerri McCabe

Description: Looking SSE, this photo shows an additional tank battery adjacent to the Gregory Lease Tank Battery that appeared to be out of service.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: Old Union from Highway 63 N, then Armer Rd, and left onto an oil lease road at 33.250258, -92.537361.

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: 100-0582

Orientation: 172° S

Date of Photo: 01/30/2025

Time of Photo: 1120

Latitude: 33.251200

Longitude: -92.536833

Photographer: Kerri McCabe

Description: Looking S, this photo shows a saltwater disposal (SWD) injection well associated with the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: Old Union from Highway 63 N, then Armer Rd, and left onto an oil lease road at 33.250258, -92.537361.

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: 100-0583

Orientation: 73° ENE

Date of Photo: 01/30/2025

Time of Photo: 1120

Latitude: 33.251167

Longitude: -92.536817

Photographer: Kerri McCabe

Description: Looking ENE, this photo shows a workover pit with residual crude oil and saltwater next to the SWD well in Photo No. 12.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: Old Union from Highway 63 N, then Armer Rd, and left onto an oil lease road at 33.250258, -92.537361.

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: 100-0584

Orientation: 52° NE

Date of Photo: 01/30/2025

Time of Photo: 1120

Latitude: 33.251167

Longitude: -92.536792

Photographer: Kerri McCabe

Description: Looking NE, this photo shows a closeup of the workover pit from Photo No. 13.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: Old Union from Highway 63 N, then Armer Rd, and left onto an oil lease road at 33.250258, -92.537361.

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: 100-0600

Orientation: 43° NE

Date of Photo: 01/30/2025

Time of Photo: 1128

Latitude: 33.250217

Longitude: -92.536933

Photographer: Kerri McCabe

Description: Looking NE, this photo shows another SWD injection well associated with the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: Old Union from Highway 63 N, then Armer Rd, and left onto an oil lease road at 33.250258, -92.537361.

City: El Dorado

County/Parish: Union

State: Arkansas



Photo File Name: 100-0601

Orientation: 60° ENE

Date of Photo: 01/30/2025

Time of Photo: 1128

Latitude: 33.250217

Longitude: -92.536873

Photographer: Kerri McCabe

Description: Looking ENE, this photo shows a workover pit with residual crude oil and saltwater next to the SWD in Photo No. 15.