U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Winganon Oil Spill Project - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: **POLREP #6**
Progress
Winganon Oil Spill Project
V6KC
Winganon, OK
Latitude: 36.5797986 Longitude: -95.5333757

To:
From: Roberto Bernier, FOSC
Date: 2/22/2011
Reporting Period: December 01, 2010 - February 21, 2011

1. Introduction

1.1 Background

Site Number:	V6KC	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	
Response Authority:	OPA	**Response Type:**	Emergency
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	12/14/2009	**Start Date:**	12/14/2009
Demob Date:		**Completion Date:**	4/30/2011
CERCLIS ID:		**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:	E10606	**Reimbursable Account #:**	

1.1.1 Incident Category

Discharging or Threatening to Discharge Abandoned Oil Production Wells

1.1.2 Site Description

In early 2009, the Oklahoma Corporation Commission (OCC) requested EPA-R6 assistance with abandoned oil production wells that were leaking crude oil in areas located near Lake Oologah and its tributaries. The wells were from leases that were initially part of Phase I of the Lake Oologah Oil Spill Project (Oologah Project) but were not addressed then because they were either part of an active lease or were secured at the time. With no viable responsible party (RP) after many years from the original project phase, EPA proceeded to address the wells by Plugging and Abandonment (P&A). After noticing the large number of wells now discharging or threatening to discharge crude oil, EPA conducted a re-assessment of all the wells that were not P&A within the previous Phases of the Oologah Project. The re-assessments were to determine if the wells were now discharging or threatening to discharge into navigable waters of the U.S. and adjoining shorelines.

During the winter of 2009-2010, EPA conducted a re-assessment of the wells within the Oologah Project database that were not P&A during previous phases and noticed that a substantial number of the wells were now discharging or threatening to discharge oil, unsecured, and potentially abandoned with no viable RP.

1.1.2.1 Location

The wells are located in the east side of Lake Oologah scattered within 21 Sections in Rogers and Nowata counties in Oklahoma. In specific, Sections 4, 5, 6, 8, 9, 16, 17, 20, 21, 28, 30, and 32 of Township (T) 24N, Range (R) 17E and Sections 23, 24, 25, and 26 of T 24N, R 16E, in Rogers County; and, Sections 16, 17, 28, 29, and 32 of T 25N, R 17E in Nowata County.

The Command Post for the project is located in Section 7 T 24N, R 17E, in specific 16510 A&B E 300 Road, Chelsea, Rogers Co., Oklahoma. The coordinates are Latitude 36.58018º N, Longitude 95.53283º W.

1.1.2.2 Description of Threat

The re-assessment revealed that most of the wells seemed to be abandoned and that equipment associated with production has been removed, leaving the wells unsecured and many of them substantially

discharging oil onto the surrounding area. The wells that are not visually leaking are completely unsecured with crude oil measured inside the well within a close distance from the top of the casing. All the unsecure and/or leaking wells are located next or near to a ditch, ravine, or creek that drains directly to Lake Oologah within a short distance. Drainage throughout the project area is within 0 to 4 miles of and contiguous with the lake. Lake Oologah is a navigable waterway of the U.S. and a drinking water source for the city of Tulsa and other smaller municipalities in the area.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Between November of 2009 and January of 2010, EPA conducted a comprehensive re-assessment of wells not P&A within Phases I, II, and III of the Oologah Project. After corroborating previous property access agreements, ground teams visited the sites using GPS coordinates already logged into the project database. The reassessment consisted of ground inspections of each site for visual observations, and determining the depth of fluids from the top of casing for those wells that a discharge was not apparent.

Close to 2,500 well sites within 36 Sections were visited and a substantial number of the wells are now actively discharging or threatening to discharge crude oil, unsecured, and potentially abandoned with no viable RP. Of those, 228 wells were identified to require some type of removal action (plugging or repairs). Based on observations and discussion with current owners and/or operators still producing oil in the area, about one half of those wells can be addressed by RPs. The rest appear to be abandoned with almost no possibility that a viable potential RP (PRP) could be found. Few smaller properties were not reassessed for logistical reasons and the team decided to wait until the start of field activities (P&A) to resume the reassessment. As of February 2011, only one property the size of half a Section still needs to be reassessed, but it appears that only a few wells remain in the property due to plugging conducted previously by the coal mining company.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Between December 2010 and February 2011, EPA continued to address abandoned and unsecured or leaking oil wells within Rogers and Nowata Counties, Oklahoma. Oil wells without a viable RP are plugged and abandoned (P&A), which generally consists of filling well bore with cement to prevent oil from discharging onto the surface and into a navigable water body. In addition, EPA has coordinated clean-up of leaking oil wells with RPs.

2.1.2 Response Actions to Date

For this reporting period, EPA has addressed 36 additional abandoned wells for a total of 56 wells for the project. Significant delays were encountered due to the holiday season and required drilling of previously plugged wells, but mostly and more significantly the delays were due to extreme winter weather. During this reporting period, the addressed oil wells were located in Section 30-T24N-R17E of Rogers County or Project Area (PA) 13; and Sections 17-T25N-R17E, 20-T25N-R17E, 29-T25N-R17E, and 28-T25N-R17E of Nowata County or PAs 41, 39, 37, and 38. See uploaded maps for Section numbers/PA cross reference.

Since initiation of P&A activities on April 20, 2010, EPA has addressed a total of 56 abandoned and unsecured oil wells. Of the 56 addressed oil wells, 52 oil wells have been P&A by cut and capping. Five of them required the drilling of previously poured cement done incorrectly in the distant past by unknown parties. EPA addressed those wells since oil was seeping and leaking through the bad plug. In addition, EPA has coordinated with viable RPs clean-up and remediation activities of well sites for which they are liable. This included the repair of leaking wells or securing those that were threatening to leak. So far the project have been delayed due several incidents including the mobilization of resources to the Deepwater Horizon Gulf Response for over 3 months during last summer. Most recently, extreme winter weather has been the main cause of project shut downs and delays. Record breaking temeratures, snow and ice were registed in NE Oklahoma this winter. Field activities are seriously hindered due to effected equipment, transportation, accessibility, etc. After the most recent storm, field activities resumed on February 14.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

EPA continues to coordinate with active RPs to verify that their work to secure the wells within their responsibility is performed properly. As of today, seven RPs or active operators are working or have completed work to secure the wells within their responsibility. OSC Bernier still coordinating with those RPs for them to provide final completion reports for our records and to conduct final inspection of those wells. So far, RPs with problem wells within PAs 19, 24, 25, 26, 27, 28, 30, 31, 32, 41, and 42 have continue their efforts to correct or secure the wells and prevent a discharge of oil. After visual inspection by the OSC, around 60 wells have been P&A, repaired and/or secured by these RP as part of the coordinating efforts with EPA.

Also, EPA has sent Notice of Federal Interest letters to a recently found PRPs for unsecured and/or leaking oil wells in an oil lease within PAs 29 and 32 that appears abandoned. There is a significant number of wells within this lease that meet the project criteria to be P&A by EPA. Over the past several years, the oil lease has been owned and/or operated by several entities with no clear, official, or definitive title to own or operate the lease. EPA is working closely with the State to determine if in fact there is a viable RP for this lease. Last week, another NOFI was sent to an RP in PA 17 for a badly operated active lease. The OSC contacted the active operator and is coordinating the repair of the leaking wells, currently producing crude oil.

2.2 Planning Section

2.2.1 Planned Response Activities

- Continue to address unsecured and abandoned oil wells.
- Continue to coordinate clean-up activities of leaking oil wells with RPs.
- Conduct assessments to locate unsecured and/or leaking oil wells within one additional property.
- Conduct RP research on leaking oil wells to locate viable RP, as needed.

2.2.2 Next Steps

2.2.3 Issues

Because of winter weather, it is expected for field activities to have additional delays. Typically, winter storms can be expected in NE Oklahoma until late March.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

Oklahoma Corporation Commission (OCC)
Oklahoma Department of Environmental Quality (ODEQ)

4. Personnel On Site

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.