

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Three"N" One Product - FPN E12625 - Removal Polrep  
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region VI

**Subject:** POLREP #1  
Initial  
Three"N" One Product - FPN E12625  
V6NM  
Shreveport, LA  
Latitude: 32.6304540 Longitude: -93.8205060

**To:** Lawrence Stanton, EPA HQ  
Peter Ricca, LDEQ  
Ragan Broyles, Superfund Division

**From:** Bryant Smalley, OSC

**Date:** 2/11/2013

**Reporting Period:** 8/31/2012 - 1/31/2013

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	V6NM	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	
<b>Response Authority:</b>	OPA	<b>Response Type:</b>	Emergency
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Assessment
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>		<b>Start Date:</b>	8/31/2012
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>		<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>	E12625	<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

Assessment, potential removal of a tank battery and plugging and abandonment (P&A) of the orphaned well.

#### 1.1.2 Site Description

The facility consists of a tank battery with one 200 barrel oil tank, an oil/water separator and a produced water tank, and an orphaned production well, identified as the Oden 001; (SN 990180).

##### 1.1.2.1 Location

The facility is located in a rural area on the East side of Hwy 71, approximately 3 miles North of State Route 538, North of Shreveport, Caddo Parish, LA, in the Caddo Pines Island Field. Section 20, Township 19N, Range 14W.

Lat: 32.6304N Long: -93.820636W

##### 1.1.2.2 Description of Threat

The well is unsecured and reportedly leaking oil. The oil tank is partially full and secondary containment is circumvented due to open drain pipes through the containment wall. Drainage from the facility will travel South approximately 75 yards into an unnamed creek; thence to the Southwest approximately .5 miles to a perennial drainage channel; thence to Twelvemile Bayou.

##### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Due to the unsecured condition of the wellhead, it appears that rainwater is entering the wellhead and displacing the oil, causing the oil to overflow and spill on to the ground. Additionally, the tanks in the tank battery are in degraded condition and currently have no actual secondary containment. An actual and substantial threat of discharge was determined to exist by the Federal On-scene Coordinator (FOSC). Catastrophic failure of the oil tank is possible and discharge of oil from the wellhead into site drainage appears imminent. As a result, the drainage channel and Twelvemile Bayou would be impacted if action is not taken to mitigate this threat.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

On August 3, 2012, Louisiana Department of Natural Resources (LDNR), Office of Conservation, referred this leaking orphaned well to the Environmental Protection Agency (EPA) Region 6, to be considered for Oil Pollution Act (OPA) response actions.

**2.1.2 Response Actions to Date**

On October 3, 2012, EPA and EPA's technical contractor (START) visit the site with LDNR Agent, William Sniffen to conduct a more comprehensive assessment. The assessment confirmed the well is definitely leaking oil and the Tank Battery is in poor condition.

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

EPA has conducted an RP research at the Caddo Parish courthouse and sent Notices of Federal Interest (NOFIs) to the potential Responsible Parties. According to LDNR information, the last known Owner/Operator was Three "N" One Production. Due to unclear information uncovered in the Title search, NOFIs were sent to Nadel & Gussman–Jetta Operating, Franks Farms, LLC, and Three "N" One Production, Inc. All three Parties responded to the NOFIs and after review of the provided information, Three "N" One Production, Inc. was identified as the RP. Mr. Lee A. Green, Jr., of Three "N" One Production, Inc., has expressed an interest in doing the Removal and P&A himself and has filed the appropriate paperwork with LDNR to obtain a work permit. LDNR and EPA agreed to give Mr. Green until March 18, 2013, to commence P&A operations.

**2.1.4 Progress Metrics**

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

**2.2 Planning Section**

**2.2.1 Anticipated Activities**

The EPA On-Scene Coordinator (OSC) will monitor the RPs progress to assure the removal is completed properly.

**2.2.1.1 Planned Response Activities**

If the RP does not complete the removal and well P&A as indicated, EPA will conduct a removal action and well P&A at the facility.

**2.2.1.2 Next Steps**

Monitor RP.

**2.2.2 Issues**

Non Known.

**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**

Louisiana Department of Natural Resources (LDNR)

**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.